



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

12/14/12

REPLY TO THE ATTENTION OF:

LR-8J

Mr. Ron Mitchell
General Manager
Badger Disposal of Wisconsin, Incorporated
5611 West Hemlock Street
Milwaukee, Wisconsin 53223

C2

Re: Badger Disposal of Wisconsin, Incorporated
EPA I.D. No.: WID 988 580 056

Dear Mr. Mitchell:

On September 13, 2012, the U.S. Environmental Protection Agency issued a Notice of Violation to Badger Disposal of Wisconsin, Incorporated (Badger Disposal) in response to violations of the hazardous waste exporter regulations identified in information from Badger Disposal and the Bureau of Customs and Border Protection, Department of Homeland Security. Subsequent to EPA's Notice of Violation you submitted additional information regarding the identified violations in correspondence dated October 11, 2012.

This letter is to inform you that EPA has reviewed the referenced response, and does not plan additional enforcement action at this time. This letter does not limit the applicability of the requirements evaluated, or of other federal or state statutes or regulations. EPA and the Wisconsin Department of Natural Resources will continue to evaluate Badger Disposal in the future.

If you have any questions regarding this letter, please contact Michael Cunningham, of my staff, at (312) 886-4464.

Sincerely,

A handwritten signature in cursive script that reads "Gary Victorine".

Gary Victorine, Chief
RCRA Branch

cc: Patricia Chabot, WDNR (Patricia.Chabot@Wisconsin.gov)



April 18, 2012

United States Environmental Protection Agency
Region 5
Attn. Michael Cunningham
77 West Jackson Boulevard
Mail Code LR-8J
Chicago, IL 60604-3590

Subject: Request for Information

Dear Mr. Cunningham:

Enclosed you will find the response to the Request of Information letter sent to Badger Disposal of WI., Inc. regarding our 2009 Hazardous Waste Export Report to the EPA.

Please note the two errors identified in requests 5 and 6 of the request of information and contact me if there is anything further that needs to be completed to correct these omissions.

Per our phone conversations after receiving this request Badger Disposal will begin to use weights only, instead of gallons, when manifesting all waste for export. I believe that we agree that this will be the best way to match information that is provided on the manifest with the information in the annual report.

If you have any further questions regarding the request of information or this response I can be reached at (414)760-9175 ext 222 or via email at ronm@badgerdisposal.com.

Sincerely,
Badger Disposal of WI., Inc.

Ron Mitchell
General Manager

Enclosure

Request of Information Response
Badger Disposal of WI., Inc.
U.S. EPA ID Number: WID988580056

- Request 1. This response was prepared by Ron Mitchell, General Manager
- Request 2. All materials are weighed on a scale at Badger Disposal prior to export. This is performed to verify that the truck weight is correct for proper transportation of the material and for preparation of the Canadian manifests which is prepared in Kilograms.
- Request 3. All materials are weighed on a scale at Badger Disposal prior to export. This is performed to verify that the truck weight is correct for proper transportation of the material and for preparation of the Canadian manifests which is prepared in Kilograms.
- Request 4. All materials are weighed on a scale at Badger Disposal prior to export. This is performed to verify that the truck weight is correct for proper transportation of the material and for preparation of the Canadian manifests which is prepared in Kilograms.
- Request 5. All materials are weighed on a scale at Badger Disposal prior to export. This is performed to verify that the truck weight is correct for proper transportation of the material and for preparation of the Canadian manifests which is prepared in kilograms. There was an error in the conversion of kilograms into pounds when preparing the annual report. Instead of multiplying by the correct conversion of kilograms into pounds the kilograms were divided into pounds resulting in the 2,375 pounds that was reported. The actual weight should have been reported as 11,495 lbs.
- Request 6. The waste Environmentally Hazardous Substances, Liquid, N.O.S. (sodium sulfide) UN3082 shipping name material was inadvertently included in the report with the Waste Environmentally Hazardous Substances, Solid, N.O.S. UN3077 shipping name material.

I certify under the penalty of law that I have examined and am familiar with the information submitted in responding to this information request for production of documents. Based on my review of all relevant documents and inquiring of those individuals immediately responsible for providing all relevant information and documents, I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A handwritten signature in cursive script that reads "Ron Mitchell".

Ron Mitchell
Badger Disposal of WI., Inc.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

AUG 26 2010

ENFORCEMENT SENSITIVE AND CONFIDENTIAL

OFFICE OF
ENFORCEMENT AND
COMPLIANCE ASSURANCE

MEMORANDUM

SUBJECT: Referral of Badger Disposal of Wisconsin, Inc., Milwaukee, WI, for Failure to Accurately Report the Total Amount of Hazardous Waste Shipped in its 2009 Annual Report of Hazardous Waste Exports, in Violation of 40 CFR §262.56(a)(4) and 262.56(a)(6)

FROM: Robert G. Heiss, Director *ELK for R664*
International Compliance Assurance Division
Office of Federal Activities

TO: Mary S. Setnicar
RCRA Enforcement Manager
Region V

I. Summary

As provided in the RCRA regulations, our office is designated to receive notifications of intent to export from primary exporters of hazardous waste, 40 CFR §262.53(b); to issue acknowledgments of consent to primary exporters following consent by the receiving country, 40 CFR §262.53(f); to receive shipment manifests for each hazardous waste exported, 40 CFR §262.20; and to receive annual export reports, 40 CFR §262.56. Based on our review of documents available to us, we have determined that Badger Disposal of Wisconsin, Inc., Milwaukee, WI (Badger), filed an inaccurate 2009 Primary Exporter of Hazardous Waste Annual Report with our office, contrary to 40 CFR §262.56. Accordingly, we are referring this matter to your office for review and initiation of appropriate enforcement action.

Both the statutory and regulatory requirements to report exports of hazardous wastes should be strictly enforced to ensure adequate environmental protection. The failure of Badger, as primary exporter, to submit an accurate annual report is extremely harmful to the program and prevents EPA from discharging its reporting commitments under international agreements. Because the annual report provides a reconciliation of data pertaining to the exporter's transboundary movements during the year, it enables EPA to verify the completeness of shipping information reflected in the individual RCRA hazardous waste manifests obtained from the U.S. Bureau of Customs and Border Protection, Department of Homeland Security (Customs). Discrepancies in documentation may lead to inquiries about proper handling or disposal of

wastes in a manner consistent with applicable environmental requirements. Moreover, annual reports provide the best available information for purposes of reporting annual shipments of hazardous waste from the United States.

II. Regulatory Requirements

1. Parties

- a. "Primary exporter" is defined in 40 CFR §262.51 as "any person who is required to originate the manifest for a shipment of hazardous waste in accordance with 40 CFR §262, subpart B, or equivalent State provision, which specifies a treatment, storage, or disposal facility in a receiving country as the facility to which the hazardous waste will be sent and any intermediary arranging for the export."
- b. "Generator" is defined in 40 CFR §260.1 as "any person whose act or process produces hazardous waste or whose act first causes hazardous waste to be subject to regulation"

2. Annual Report

The RCRA regulations, at 40 CFR §262.56(a) ("Annual Report"), provide, in pertinent part, that

[p]rimary exporters of hazardous waste shall file with the Administrator no later than March 1 of each year, a report summarizing the types, quantities, frequency, and ultimate destination of all hazardous waste exported during the previous calendar year.

Subparagraph (a)(4) provides that the annual report shall include:

By consignee, for each hazardous waste exported, a description of the hazardous waste, the EPA hazardous waste number (from 40 CFR part 261, subpart C or D), DOT hazard class, the name and US EPA ID number (where applicable) for each transporter used, the total amount of waste shipped and number of shipments pursuant to each notification . . .

Subparagraph (a)(6) requires the report to include a certification "signed by the primary exporter" which states:

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment. Evidentiary Basis

III. Evidence

We have attached copies of the following documents:

1. Summary of 2009 Hazardous Waste Exports by Badger, to Stablex Canada, Inc., prepared by EPA.
2. Summary of 2009 Export Violations to Stablex Canada, Inc., prepared by EPA.
3. A copy of the 2009 Annual Export Report filed by Badger, dated March 1, 2010, with certification signed by Ron Mitchell.
4. Fourteen (14) uniform hazardous waste manifests documenting shipments of hazardous waste from Badger to Stablex Canada, Inc.

IV. Discussion

Apparent export violations by Badger to Stablex are found in the attached **Summary of 2009 Export Violations**, grouped by UN number. Manifests which were sent to EPA by Customs were used to determine the amount of waste that Badger actually exported. All manifested RCRA regulated waste with EPA waste codes was grouped by UN number. Actual amounts exported are found in the attached **Summary of 2009 Hazardous Waste Exports**.

Of 14 hazardous waste streams exported in 2009, Badger failed to accurately report 4: UN1479, Waste Oxidizing Solid, N.O.S.; UN1849, Waste Environmentally Hazardous Substances, Liquid, N.O.S. ; UN3098, Oxidizing Liquid, Corrosive, N.O.S.; and UN3264, Waste Corrosive Liquids, N.O.S. Badger also failed to report all exports of UN3082, Waste Environmentally Hazardous Substances, Liquid, N.O.S. Manifests which were sent to EPA by Customs were used to determine the amount of waste that Badger actually exported. Apparent violations are as follows:

Hazardous Waste Type (UN/NA)	Amount in Annual Report (pounds)	Amount in Manifests (pounds)	Amount Underreported (pounds)
UN1479	11119	12303	1184
UN1849	57	116	59
UN3098	1079	10995	9916
UN3264	2375	10995	8620
UN3082	0	458	458

Badger apparently violated the reporting requirement found at 40 CFR §262.56(a)(4) and the certification pursuant to 40 CFR §262.56(a)(6) that the information provided in the Annual Report be "true, accurate, and complete" by failing to accurately report its exports of UN1479, UN3082, UN3098, and UN3264. All other elements of Badger's 2009 hazardous waste exports are in compliance.

V. Next Steps

We look forward to your reviewing the referred matters at your earliest convenience. The originals of the referenced attachments are available in my office as needed. If you have any questions, please contact Eva Kreisler of my staff at (202) 564-8186. Please keep us advised of any developments.

Attachments

cc: Rosemarie Kelley w/out attachments

Badger Disposal of WI, Inc., Milwaukee, WI 53223
WID988580056
Summary of 2009 Export Violations to Stablex Canada, Inc.

waste type	annual report <u>amount</u>	manifest <u>amount</u>	unreported <u>amount</u>	undereported <u>amount</u>
UN1479	11119	12303	0	1184
UN1588	6732	5131	0	0
UN1849	57	116	0	59
UN1935	67846	50987	0	0
UN2922	2198	458	0	0
UN3077	6802	4581	0	0
UN3082	0	458	458	0
UN3085	5729	708	0	0
UN3093	9887	8246	0	0
UN3098	1079	10995	0	9916
UN3264	2375	10995	0	8620
UN3287	2977	499	0	0
UN3288	5724	3207	0	0
UN3289	3238	1374	0	0
	in pounds	in pounds	in pounds	in pounds

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1007

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53223
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When used internationally
affix customs declarations
(PS Form 2976, or 2976A).



EM 370670558 US

Mailing Label
Label 11-F, April 2004



UNITED STATES POSTAL SERVICE®

Post Office To Addressee

ORIGIN (POSTAL SERVICE USE ONLY)				DELIVERY (POSTAL SERVICE USE ONLY)			
PO ZIP Code 53223	Day of Delivery 3	Postage \$18.30	Return Receipt Fee \$	Delivery Attempt	Time <input type="checkbox"/> AM <input type="checkbox"/> PM	Employee Signature	
Scheduled Date of Delivery 3/10	Month 3	Scheduled Time of Delivery <input checked="" type="checkbox"/> Noon <input type="checkbox"/> 3 PM	GOD Fee \$	Mo. Day	Time <input type="checkbox"/> AM <input type="checkbox"/> PM	Employee Signature	
Time Accepted 4:50	Flat Rate <input type="checkbox"/> or Weight <input checked="" type="checkbox"/>	Int'l Alpha Country Code 2	Acceptance Emp. Initials dn	Delivery Date	Time <input type="checkbox"/> AM <input type="checkbox"/> PM	Employee Signature	
CUSTOMER USE ONLY				NO DELIVERY <input type="checkbox"/> Weekend <input type="checkbox"/> Holiday			
METHOD OF PAYMENT: Express Mail Corporate Acct. No.				Customer Signature			
FROM: (PLEASE PRINT) Badger Disposal of WI, Inc. 5611 West Hemlock Street Milwaukee, WI 53223				TO: (PLEASE PRINT) USEPA Artel Rios Building Mail Code: 2254A 1200 Pennsylvania Avenue, NW Washington, DC 20460 Attn: International Compliance Assurance Division			

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Badger Disposal of WI, Inc., Milwaukee, WI 53223
WID988580056
Summary of 2009 Hazardous Waste Exports to Stablex Canada, Inc.

<u>UN1479</u>	<u>UN1588</u>	<u>UN1849</u>	<u>UN1935</u>	<u>UN2922</u>	<u>UN3077</u>	<u>UN3082</u>	<u>UN3085</u>	<u>UN3093</u>	<u>UN3098</u>	<u>UN3264</u>	<u>UN3287</u>	<u>UN3288</u>	<u>UN3289</u>
55	135	<u>14</u>	1686	<u>55</u>	<u>550</u>	<u>55</u>	55	715	55	55	5	220	<u>165</u>
50	28		200				<u>30</u>	165	55	440	<u>55</u>	<u>165</u>	
137	149		3575					<u>110</u>	440	<u>825</u>			
320	139		275						715				
385	55		330						<u>55</u>				
85	<u>110</u>		<u>55</u>										
150													
55													
120													
<u>120</u>													
1477	616	14	6121	55	550	55	85	990	1320	1320	60	385	165
<u>x 8.33</u>	<u>x 8.33</u>	<u>x 8.33</u>	<u>x 8.33</u>	<u>x 8.33</u>	<u>x 8.33</u>	<u>x 8.33</u>	<u>x 8.33</u>	<u>x 8.33</u>	<u>x 8.33</u>	<u>x 8.33</u>	<u>x 8.33</u>	<u>x 8.33</u>	<u>x 8.33</u>
12303	5131	116	50987	458	4581	458	708	8246	10995	10995	499	3207	1374

conversion factors: gallons x 8.33 = pounds, tons x 2000 = pounds



Badger Disposal of WI, Inc.

2009 EPA Hazardous Waste Export Shipment Report

Badger Disposal of WI., Inc.
5611 West Hemlock Street
Milwaukee, Wisconsin 53223

EPA ID No.: WID988580056

Waste Description	Shipping Name	Class	(UN/NA)
12833 Cyanide Solutions	RQ, Waste Cyanide Solutions n.o.s.	6.1	UN1935
EPA Waste No.	D003, F009, D002, F007, D011, D006, D007, D008, P029, P098		
Transporter:	Freehold Cartage, Inc.	EPA ID No. NJD054126164	
Consignee:	Stablex Canada, Inc.		
Total Shipments	4	Total Volume: 67,846 lbs	

Waste Description	Shipping Name	Class	(UN/NA)
12832 Cyanide Solids	RQ, Waste Cyanides, Solid, Inorganic, n.o.s	6.1	UN1588
EPA Waste No.	D003, P029, P098, F011, F007, D002, D007, D008		
Transporter:	Freehold Cartage, Inc.	EPA ID No. NJD054126164	
Consignee:	Stablex Canada, Inc.		
Total Shipments:	3	Total Volume: 6,732 lbs	

Waste Description	Shipping Name	Class	(UN/NA)
19156 Cyanide Liquid	RQ, Waste Toxic Liquids, Inorganic, N.O.S.	6.1	UN3287
EPA Waste No.	D004, P012, P011, P087, P114, P010, D010, D003, D008, D006, P098, P106, P029, P104, D007, D011, D005, U204, F007, P030		
Transporter:	Freehold Cartage, Inc.	EPA ID No. NJD054126164	
Consignee:	Stablex Canada, Inc.		
Total Shipments:	3	Total Volume: 2,977 lbs	

5611 W. Hemlock St. Milwaukee, WI 53223


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Waste Description	Shipping Name	Class	(UN/NA)
012833 Cyanide Liquid	RQ, Waste Toxic Solid, Corrosive Inorganic, N.O.S.	6.1(8)	UN3289
EPA Waste No.	F009,D002,D008,D011		
Transporter:	Freehold Cartage, Inc.	EPA ID No.	NJD054126164
Consignee:	Stablex Canada, Inc.		
Total Shipments:	2	Total Volume:	3,238 lbs

Waste Description	Shipping Name	Class	(UN/NA)
12887 Neutral Solid	Waste Environmentally Hazardous Substances, Solid, N.O.S.	9	UN3077
EPA Waste No.	D003,F007,F008		
Transporter:	Freehold Cartage, Inc.	EPA ID No.	NJD054126164
Consignee:	Stablex Canada, Inc.		
Total Shipments:	2	Total Volume:	6,802 lbs

"I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment."

Signature: 

Date: 3/11/10

Waste Description	Shipping Name	Class	(UN/NA)
012831 Oxidizing Liquid	RQ, Waste Corrosive Liquid, Oxidizing, N.O.S.	8(5.1)	UN3093

EPA Waste No. D002,D001

Transporter: Freehold Cartage, Inc. EPA ID No. NJD054126164

Consignee: Stablex Canada, Inc.

Total Shipments: 3 Total Volume: 9,887 lbs

Waste Description	Shipping Name	Class	(UN/NA)
12830 Acid Liquid	RQ, Waste Corrosive Liquids, N.O.S.	8	UN3264

EPA Waste No. D002,D007

Transporter: Freehold Cartage, Inc. EPA ID No. NJD054126164

Consignee: Stablex Canada, Inc.

Total Shipments: 1 Total Volume: 2,375 lbs

Waste Description	Shipping Name	Class	(UN/NA)
13196 Neutral Solid	RQ, Waste Sodium Sulfide	8	UN1849

EPA Waste No. D002,D003

Transporter: Freehold Cartage, Inc. EPA ID No. NJD054126164

Consignee: Stablex Canada, Inc.

Total Shipments: 1 Total Volume: 57 lbs

Waste Description	Shipping Name	Class	(UN/NA)
012832 Cyanide Solid	RQ, Waste Toxic Solid, Inorganic,N.O.S.	6.1	UN3288

EPA Waste No. D003,D006,D007,F009,D006,D011,F006

Transporter: Freehold Cartage, Inc. EPA ID No. NJD054126164

Consignee: Stablex Canada, Inc.

Total Shipments: 3 Total Volume: 5,724 lbs

Waste Description	Shipping Name	Class	Code (UN/NA)
13189 Oxidizer Solid	RQ, Waste Oxidizing Solid, N.O.S.	5.1	UN1479
EPA Waste No.	D001,D005,D006,D007,D008,D011,D003,D002		
Transporter:	Freehold Cartage, Inc.	EPA ID No. NJD054126164	
Consignee:	Stablex Canada, Inc.		
Total Shipments:	4	Total Volume: 11,119 lbs	

Waste Description	Shipping Name	Class	(UN/NA)
12830 Acid Liquid	RQ, Waste Corrosive Liquids, Toxic, N.O.S.	8 (6.1)	UN2922
EPA Waste No.	D002,U134,D004,D006,D007,D008,D009,D010,D011, U204,F008		
Transporter:	Freehold Cartage, Inc.	EPA ID No. NJD054126164	
Consignee:	Stablex Canada, Inc.		
Total Shipments:	2	Total Volume: 2,198 lbs	

Waste Description	Shipping Name	Class	(UN/NA)
13187 Oxidizing Solid	RQ, Waste Oxidizing Solid, Corrosive, N.O.S.	5.1 (8)	UN3085
EPA Waste No.	D002,D001,D007		
Transporter:	Freehold Cartage, Inc.	EPA ID No. NJD054126164	
Consignee:	Stablex Canada, Inc.		
Total Shipments:	2	Total Volume: 5,729 lbs	

Waste Description	Shipping Name	Class	(UN/NA)
013198 Oxidizing Liquid	RQ, Waste Oxidizing Liquid, Corrosive. N.O.S.	5.1(8)	UN3098
EPA Waste No.	D001.D002,D004,D005,D006,D007,D008,D011		
Transporter:	Freehold Cartage, Inc.	EPA ID No. NJD054126164	
Consignee:	Stablex Canada, Inc.		
Total Shipments:	2	Total Volume: 1,079 lbs	

47408

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number WID988580056	2. Page 1 of 2	3. Emergency Response Phone (414)236-1080	4. Manifest Tracking Number 005357894 JJK		
5. Generator's Name and Mailing Address Badger Disposal of WI., Inc. 5611 West Hemlock Street Milwaukee, WI 53223 Generator's Phone: (414)760-9175			Generator's Site Address (if different than mailing address)				
6. Transporter 1 Company Name Freehold Cartage, Inc.			U.S. EPA ID Number NJD054126164				
7. Transporter 2 Company Name			U.S. EPA ID Number				
8. Designated Facility Name and Site Address Stablex Canada, Inc. 760 Industrial Blvd Blainville, QC JVC 3V4 Facility's Phone: (450)430-9230			U.S. EPA ID Number NYD980756415				
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No. Type		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
	X	1. UN1479, RQ, Waste Oxidizing Solid, N.O.S. (potassium Nitrate, cupric nitrate), 5.1, PG II	1	DF	55	G	D001D005 D006 D007D008 D011
	X	2. UN3098, RQ, Waste Oxidizing Liquid, Corrosive, N.O.S. (nitric acid, chromium trioxide) 5.1(8), PG II	1	DM	55	G	D001D002 D007 D011
	X	3. UN3098, RQ, Waste Oxidizing Liquid, Corrosive, N.O.S. (nitric acid, chromic acid) 5.1(8), PG II	1	DM	55	G	D001D002 D007 D008D011 D004
	X	4. UN3264, RQ, Waste Corrosive Liquid, Acidic, Inorganic, N.O.S. (sulfuric acid, hypophosphorous acid) 8, PG II	1	DF	55	G	D002
14. Special Handling Instructions and Additional Information 1. LP#00115561 APP#013198 ERG#140 2. LP#00124655 APP#013195 ERG#140 3. LP#00123762 APP#013195 ERG#140 D005, D006 4. LP#00097799 APP#013195 ERG#154							
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.							
Generator's/Officer's Printed/Typed Name Badger Disposal Ron Mitchell/General Manager			Signature <i>Ron Mitchell</i>		Month Day Year 2/6/09		
TRANSPORTER	16. International Shipments <input type="checkbox"/> Import to U.S. <input checked="" type="checkbox"/> Export from U.S.		Port of entry/exit: <i>Louisiana or Alexandria Bay</i> Date leaving U.S.: <i>15 Feb 2009</i>				
	17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name <i>DONNIE DRIGGERS</i> Transporter 2 Printed/Typed Name		Signature <i>Donnie Driggers</i>		Month Day Year 12/06/09		
DESIGNATED FACILITY	18. Discrepancy 18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection Manifest Reference Number:						
	18b. Alternate Facility (or Generator) Facility's Phone:				U.S. EPA ID Number		
	18c. Signature of Alternate Facility (or Generator)					Month Day Year	
	19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)						
	1.		2.		3.		4.
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a Printed/Typed Name Signature Month Day Year							

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)		21. Generator ID Number WID988580056	22. Page 2 of 2	23. Manifest Tracking Number 005357894JJK		
24. Generator's Name Badger Disposal of WI., Inc.						
25. Transporter _____ Company Name				U.S. EPA ID Number		
26. Transporter _____ Company Name				U.S. EPA ID Number		
27a. HM	27b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	28. Containers		29. Total Quantity	30. Unit WL/Vol.	31. Waste Codes
		No.	Type			
X	5. UN2922, RQ, Waste Corrosive Liquid, Toxic, N.O.S. (hydrofluoric acid, phosphoric acid) 8(6.1), PG II	1	DF	55	G	D002 U134D004 D006 D007D008
X	6. UN3287, Waste Toxic Liquid, Inorganic, N.O.S. (arsenic trioxide, arsenic pentoxide) 6.1, PG I	1	DF	5	G	D004 P012P011 P087 P114P010
32. Special Handling Instructions and Additional Information 5.LP#00093246 APP#019516 ERG#154 D009,D010,D011,U204 6.LP#00088662 APP#013196 ERG#151 D010						
33. Transporter _____ Acknowledgment of Receipt of Materials						
Printed/Typed Name		Signature			Month	Day Year
34. Transporter _____ Acknowledgment of Receipt of Materials						
Printed/Typed Name		Signature			Month	Day Year
35. Discrepancy						
36. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)						

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number WID988580056	2. Page 1 of 1	3. Emergency Response Phone (414)236-1080	4. Manifest Tracking Number 005357913 JJK		
5. Generator's Name and Mailing Address Badger Disposal of WI., Inc. 5611 West Hemlock Street Milwaukee, WI 53223				Generator's Site Address (if different than mailing address)			
6. Transporter 1 Company Name Freehold Cartage, Inc.				U.S. EPA ID Number NJD054126164			
7. Transporter 2 Company Name				U.S. EPA ID Number			
8. Designated Facility Name and Site Address Stablex Canada, Inc. 760 Industrial Blvd. Blainville, QC J7C 3V4				U.S. EPA ID Number NYD980756415			
Facility's Phone: (450)430-9230							
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No. Type		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
	X	1. UN3098, RQ, Waste Oxidizing Liquids, Corrosive, N.O.S. (chromic acid, sulfuric acid) 5.1(8), PG II	8	DF	440	G	D001 D002 D007
	X	2. UN3093, RQ, Waste Corrosive Liquids, Oxidizing, N.O.S. (nitric acid, chromic acid) 8(5.1), PG II	13	DF	715	G	D001 D002
	X	3. UN3264, RQ, Waste Corrosive Liquids, N.O.S. (nitric acid, fluoboric acid) 8, PG II	8	DF	440	G	D002 D007
	X	4. UN3264, RQ, Waste Corrosive Liquids, N.O.S. (hydrofluoric acid, sulfuric acid) 8, PG II	3	TP	825	G	D002 D007
14. Special Handling Instructions and Additional Information 1. WS#307-150 APP Stablex Code:013181 ERG#140 BDI# 2. WS#307-150 Stablex Code:012831 ERG#140 3. WS#1500173 Stablex Code:012830 ERG#154 4. WS#1500173 Stablex Code:012830 ERG#154							
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.							
Generator's/Officer's Printed/Typed Name Badger Disposal				Signature <i>Ron Mitchell</i>		Month Day Year 12 16 09	
INTL	16. International Shipments <input type="checkbox"/> Import to U.S. <input checked="" type="checkbox"/> Export from U.S.				Port of entry/exit <i>Lewiston, ME</i>		
	Transporter signature (for exports only): <i>Ron Mitchell</i>				Date leaving U.S.: <i>15 Feb 2009</i>		
TRANSPORTER	17. Transporter Acknowledgment of Receipt of Materials						
	Transporter 1 Printed/Typed Name DONNIE DRIGGERS				Signature <i>Donnie Driggers</i>		Month Day Year 02 06 09
DESIGNATED FACILITY	Transporter 2 Printed/Typed Name				Signature		Month Day Year
	18. Discrepancy						
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection							
Manifest Reference Number:							
18b. Alternate Facility (or Generator) U.S. EPA ID Number							
Facility's Phone:							
18c. Signature of Alternate Facility (or Generator) Month Day Year							
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)							
1. 2. 3. 4.							
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a							
Printed/Typed Name				Signature		Month Day Year	

474103

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number WID988580056	2. Page 1 of 1	3. Emergency Response Phone (414)236-1080	4. Manifest Tracking Number 005357915 JJK	
5. Generator's Name and Mailing Address Badger Disposal of WI., Inc. 561 West Hemlock Street Milwaukee, WI 53223 Generator's Phone: (414)760-9175			Generator's Site Address (if different than mailing address)			
6. Transporter 1 Company Name Freehold Cartage, Inc.			U.S. EPA ID Number NJD054126164			
7. Transporter 2 Company Name			U.S. EPA ID Number			
8. Designated Facility Name and Site Address Stablex Canada, Inc. 760 Industrial BLVD. Blainville, QC J7C 3V4 Facility's Phone: (450)430-9230			U.S. EPA ID Number NYD980756415			
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
		No.	Type			
X	1. UN1479, RQ, Waste Oxidizing Solid, N.O.S. (calcium hypochlorite) 5.1, PG II	1	CF	50 422	G P	D001
X	2. UN1479, RQ, Waste Oxidizing Solid, N.O.S. (OBA Canisters) 5.1, PG II	2	CF	137 1177	G P	D001D003D005
X	3. UN1479, RQ, Waste Oxidizing Solid, N.O.S. (calcium hypochlorite, barium nitrate) 5.1, PG II	8	DF	320	G	D001D005
X	4. UN1479, RQ, Waste Oxidizing Solid, N.O.S. (calcium hypochlorite, barium nitrate) 5.1, PG II	7	DM	385	G	D001D005D007
14. Special Handling Instructions and Additional Information 1. WS#307-150 Stablex Code:013189 ERG#140 BDI# 2. WS#307-150 Stablex Code:013189 ERG#140 3. WS#307-150 Stablex Code:013189 ERG#140 4. 307-150 Stablex Code:013189 ERG#140						
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.						
Generator's/Officer's Printed/Typed Name Badger Disposal Ron Mitchell/General Manager		Signature <i>Ron Mitchell</i>		Month Day Year 12 6 09		
16. International Shipments <input type="checkbox"/> Import to U.S. <input checked="" type="checkbox"/> Export from U.S.		Port of entry code: 152000000 Date leaving U.S.: 15 Feb 2009				
17. Transporter Acknowledgment of Receipt of Materials						
Transporter 1 Printed/Typed Name DOMINIC DRIGGANS		Signature <i>Domino Driggs</i>		Month Day Year 02 06 09		
Transporter 2 Printed/Typed Name		Signature		Month Day Year		
18. Discrepancy						
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection						
Manifest Reference Number:						
18b. Alternate Facility (or Generator) U.S. EPA ID Number						
Facility's Phone:						
18c. Signature of Alternate Facility (or Generator) Month Day Year						
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)						
1.		2.		3.		4.
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a						
Printed/Typed Name		Signature		Month Day Year		

478/08

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number WID988580056	2. Page 1 of 1	3. Emergency Response Phone (414)236-1080	4. Manifest Tracking Number 005357918 JJK		
5. Generator's Name and Mailing Address Badger Disposal of WI., Inc. 5611 West Hemlock Street Milwaukee, WI 53223 Generator's Phone: (414)760-9175				Generator's Site Address (if different than mailing address)			
6. Transporter 1 Company Name Freehold Cartage, Inc.				U.S. EPA ID Number NJD054126164			
7. Transporter 2 Company Name				U.S. EPA ID Number			
8. Designated Facility Name and Site Address Stablex Canada, Inc. 760 Industrial Blvd, Blainville, QC J7C 3V4 Facility's Phone: (450)430-9230				U.S. EPA ID Number NYD980756415			
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
			No.	Type			
	X	1. UN3098, RQ, Waste Oxidizing Liquid, Corrosive, N.O.S. (sodium chlorite, sodium perborate) 5.1(8), PG II	13	DF	715	G	D001 D002 D007
	X	2. UN3085, RQ, Waste Oxidizing Solid, Corrosive, N.O.S. (potassium dichromate, sodium bifluoride) 5.1(8), PG II	1	DF	55	G	D001 D002 D007
	X	3. UN3085, RQ, Waste Oxidizing Solid, Corrosive, N.O.S. (sodium nitrate, sodium hydroxide) 5.1(8), PG II	1	DM	30	G	D001 D002
14. Special Handling Instructions and Additional Information 1. WS#307-150 Stablex Code:0131873 ERG#140 2. WS#307-150 Stablex Code:0131897 ERG#140 3. WS#307-150 Stablex Code:013189 ERG#140							
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.							
Generator's/Officer's Printed/Typed Name Badger Disposal Ron Mitchell/General Manager				Signature <i>Ron Mitchell</i>		Month Day Year 2 6 09	
INTL	16. International Shipments <input type="checkbox"/> Import to U.S. <input checked="" type="checkbox"/> Export from U.S. Port of entry: Long Beach CA / Alexandria Bay NY Transporter signature (for exports only): <i>Ron Mitchell</i> Date leaving U.S.: 15 Feb 2009						
	17. Transporter Acknowledgment of Receipt of Materials						
TRANSPORTER	Transporter 1 Printed/Typed Name DONNIE DRIGGERS				Signature <i>Donnie Driggers</i>		Month Day Year 02 06 09
	Transporter 2 Printed/Typed Name				Signature		Month Day Year
SIGNATURE FACILITY	18. Discrepancy						
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection						
	Manifest Reference Number:						
	18b. Alternate Facility (or Generator) U.S. EPA ID Number						
	Facility's Phone:						
18c. Signature of Alternate Facility (or Generator)						Month Day Year	
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)							
1.		2.		3.		4.	
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a							
Printed/Typed Name				Signature		Month Day Year	

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number WID988580056		2. Page 1 of 1	3. Emergency Response Phone (414) 236-1080		4. Manifest Tracking Number 005613260 JJK			
		5. Generator's Name and Mailing Address Badger Disposal of WI., Inc. 5611 West Hemlock Street Milwaukee, WI 53223 Generator's Phone: (414) 760-9175								
		Generator's Site Address (if different than mailing address)								
		6. Transporter 1 Company Name Freehold Cartage, Inc. (732) 462-1001					U.S. EPA ID Number NJD054126164			
		7. Transporter 2 Company Name					U.S. EPA ID Number			
		8. Designated Facility Name and Site Address Stablex Canada, Inc. 760 Industrial Blvd. Blainville, QC J7C 3V4 Facility's Phone: (450) 430-9230					U.S. EPA ID Number NYD980756415			
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))			10. Containers No. Type		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes	
	X	1. UN3093, RQ, Waste Corrosive Liquids, Oxidizing, N.O.S. (sodium nitrate, sodium hydroxide) 8(5.1), PG II			3 DF		165	G	D002D001	
	X	2. UN1479, RQ, Waste Oxidizer Solid, N.O.S. (barium nitrate, calcium hypochlorite) 5.1, PG II			3 DM		85	G	D001D005	
	X	3. UN1479, RQ, Waste Oxidizer Solid, N.O.S. (calcium hypochlorite) 5.1, PG II			6 DF		150	G	D001	
		4.								
14. Special Handling Instructions and Additional Information 1. WS#307-150 Stablex Code:012884 ERG#140 BDI# 2. WS#307-150 Stablex Code:012884 ERG#140 3. WS#307-150 Stablex Code:012884 ERG#140 <div style="text-align: right; margin-top: 10px;"> <i>Line 2: 1x55, 1x20, 1x5 gal</i> <i>Line 3: 1x55, 2x30, 1x15, 2x5 gal</i> </div>										
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.										
Generator's/Offoror's Printed/Typed Name Badger Disposal Signature <i>Ron Mitchell</i> Month 4 Day 6 Year 09 Ron Mitchell/General Manager										
INTL	16. International Shipments <input type="checkbox"/> Import to U.S. <input checked="" type="checkbox"/> Export from U.S. Port of entry/exit: Sarnia ON / Port Huron MI Transporter signature (for exports only): <i>George Hausser</i> Date leaving U.S.: 04/07/09									
	17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name George Hausser Signature <i>George Hausser</i> Month 4 Day 6 Year 09 Transporter 2 Printed/Typed Name _____ Signature _____ Month _____ Day _____ Year _____									
DESIGNATED FACILITY	18. Discrepancy									
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection									
	Manifest Reference Number: _____									
	18b. Alternate Facility (or Generator) _____ U.S. EPA ID Number _____ Facility's Phone: _____									
	18c. Signature of Alternate Facility (or Generator) _____ Month _____ Day _____ Year _____									
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) 1. _____ 2. _____ 3. _____ 4. _____										
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a Printed/Typed Name _____ Signature _____ Month _____ Day _____ Year _____										

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number WID988580056	2. Page 1 of 1	3. Emergency Response Phone (414) 236-1080	4. Manifest Tracking Number 005613261 JJK			
5. Generator's Name and Mailing Address Badger Disposal of WI., Inc. 5611 West Hemlock Street Milwaukee, WI 53223 Generator's Phone: (414) 760-9175				Generator's Site Address (if different than mailing address)				
6. Transporter 1 Company Name Freehold Cartage, Inc.				(732) 462-1001		U.S. EPA ID Number NJD054126164		
7. Transporter 2 Company Name						U.S. EPA ID Number		
8. Designated Facility Name and Site Address Stablex Canada, Inc. 760 Industrial BLVD. Blainville, QC J7C 3V4 Facility's Phone: (450) 430-9230				U.S. EPA ID Number NYD980756415				
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
		No.	Type					
X	1. UN1588, RQ, Waste Cyanides, Inorganic, Solid, N.O.S. (cyanide, sodium) 6.1, PG II	49	DM	135 280	G	D003	P029	P098
X	2. UN1588, RQ, Waste Cyanides, Inorganic, Solid, N.O.S. (cyanide, sodium) 6.1, PG II	312	DF	28 4680	G	D003	P029	P098
X	3. UN1588, RQ, Waste Cyanides, Inorganic, Solid, N.O.S. (cyanide, filters) 6.1, PG II	2	CF	149 1246	P	D003	F007	D002
X	4. UN3288, RQ, Waste Toxic Solid, Inorganic, N.O.S. (potassium cyanide, sodium cyanide) 6.1, PG II	4	DM	220	G	D003	D006	D007
14. Special Handling Instructions and Additional Information 1. WS#1500272 Stablex Code:012832 ERG#157 BDI# 2. WS#1500272 Stablex Code:012832 ERG#157 3. WS#1500272 Stablex Code:012832 ERG#157 4. WS#1500272 Stablex Code:012832 ERG#151 Live 1 9x15 gal. Live 2 2x14 gal.								
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.								
Generator's/Officer's Printed/Typed Name Badger Disposal Ron Mitchell/General Manager				Signature <i>Ron Mitchell</i>		Month Day Year 4 6 09		
16. International Shipments <input type="checkbox"/> Import to U.S. <input checked="" type="checkbox"/> Export from U.S. Port of entry/exit: Sarnia ON / Port Huron MI Date leaving U.S.: 4/7/09								
17. Transporter Acknowledgment of Receipt of Materials								
Transporter 1 Printed/Typed Name George Hausser				Signature <i>George Hausser</i>		Month Day Year 4 6 09		
Transporter 2 Printed/Typed Name				Signature		Month Day Year		
18. Discrepancy								
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection								
18b. Alternate Facility (or Generator)						U.S. EPA ID Number		
Facility's Phone:								
18c. Signature of Alternate Facility (or Generator)						Month Day Year		
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)								
1.		2.		3.		4.		
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a								
Printed/Typed Name				Signature		Month Day Year		

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number WID988580056	2. Page 1 of 1	3. Emergency Response Phone (414) 236-1080	4. Manifest Tracking Number 005613263 JJK			
5. Generator's Name and Mailing Address Badger Disposal of WI., Inc. 5611 West Hemlock Street Milwaukee, WI 53223 Generator's Phone: (414) 760-9175				Generator's Site Address (if different than mailing address)				
6. Transporter 1 Company Name Freehold Cartage, Inc.				(732) 462-10101001		U.S. EPA ID Number NJD054126164		
7. Transporter 2 Company Name						U.S. EPA ID Number		
8. Designated Facility Name and Site Address Stablex Canada, Inc. 760 Industrial Blvd, Blainville, QC J7C 3V4 Facility's Phone: (450) 430-9230				U.S. EPA ID Number NYD980756415				
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
		No.	Type					
X	1. UN1935, RQ, Waste Cyanide Solutions, N.O.S. (cyanide, sodium) 6.1, PG II	31	DF	1686	G	D003	F007	D002
X	2. UN1935, RQ, Waste Cyanide Solutions, N.O.S. (cyanide, sodium) 6.1, PG II	4	DM	280	G	D003	D006	D007
						D008	F007	D002
14. Special Handling Instructions and Additional Information 1. WS#1500272 Stablex Code:012833 ERG#157 BDI# P029 2. WS#1500272 Stablex Code:012833 ERG#157								
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.								
Generator's/Offeror's Printed/Typed Name Badger Disposal				Signature <i>Ron Mitchell</i>		Month Day Year 4 6 09		
16. International Shipments <input type="checkbox"/> Import to U.S. <input checked="" type="checkbox"/> Export from U.S.				Port of entry/exit: Sarnia ON / Port Huron MI				
Transporter signature (for exports only): <i>George Hausser</i>				Date leaving U.S.: 04/07/09				
17. Transporter Acknowledgment of Receipt of Materials								
Transporter 1 Printed/Typed Name George Hausser				Signature <i>George Hausser</i>		Month Day Year 4 6 09		
Transporter 2 Printed/Typed Name				Signature		Month Day Year		
18. Discrepancy								
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection								
18b. Alternate Facility (or Generator)						Manifest Reference Number: U.S. EPA ID Number		
Facility's Phone:								
18c. Signature of Alternate Facility (or Generator)						Month Day Year		
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)								
1.		2.		3.		4.		
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a								
Printed/Typed Name				Signature		Month Day Year		

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number WID988580056	2. Page 1 of 1	3. Emergency Response Phone (414) 236-1080	4. Manifest Tracking Number 005613267 JJK	
5. Generator's Name and Mailing Address Badger Disposal of WI., Inc. 5611 West Hemlock Street Milwaukee, WI 53223			Generator's Site Address (if different than mailing address)			
6. Transporter 1 Company Name Freehold Cartage, Inc.			7. Transporter 2 Company Name		U.S. EPA ID Number NJD054126164	
8. Designated Facility Name and Site Address Stablex Canada, Inc. 760 Industrial BLVD. Blainville, QC J7C 3V4			U.S. EPA ID Number NYD980756415			
Facility's Phone: (450) 430-9230						
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No. Type		11. Total Quantity	12. Unit Wt./Vol.
	X	1. UN1849, Waste Sodium Sulfide, Hydrate, 8, PG II	1	DF	14	G
	X	2. UN3287, RQ, Waste Toxic Liquid, Inorganic, N.O.S. (sodium cyanide, potassium cyanide) 6.1, PG I	1	DF	55	G
		3.				
		4.				
13. Waste Codes D002 D003 D003 D008D006 P098 P106P029						
14. Special Handling Instructions and Additional Information 1.LP#00099063 Stablex Code:013196 ERG#153 2.LP#00089813 Stablex Code:013197 P104,D011,D005,D010,U204 ERG#151						
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.						
Generator's/Officer's Printed/Typed Name Badger Disposal Ron Mitchell/General Manager			Signature <i>Ron Mitchell</i>		Month Day Year 4 6 09	
TRANSPORTER INT'L	16. International Shipments <input type="checkbox"/> Import to U.S. <input checked="" type="checkbox"/> Export from U.S.		Port of entry/exit: Sarnia ON / Port Huron MI Date leaving U.S.: 4/7/09			
	17. Transporter Acknowledgment of Receipt of Materials					
	Transporter 1 Printed/Typed Name George Hausse		Signature <i>George Hausse</i>		Month Day Year 4 6 09	
Transporter 2 Printed/Typed Name		Signature		Month Day Year		
DESIGNATED FACILITY	18. Discrepancy					
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection					
	Manifest Reference Number:					
	18b. Alternate Facility (or Generator) U.S. EPA ID Number					
	Facility's Phone:					
18c. Signature of Alternate Facility (or Generator)					Month Day Year	
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)						
1.		2.		3.		4.
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a						
Printed/Typed Name			Signature		Month Day Year	

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number WID988580056	2. Page 1 of 1	3. Emergency Response Phone (414)236-1080	4. Manifest Tracking Number 001068026 GBF																													
5. Generator's Name and Mailing Address Badger Disposal of WI., Inc. 5611 West Hemlock Street Milwaukee, WI 53223			Generator's Site Address (if different than mailing address)																															
6. Transporter 1 Company Name Freehold Cartage, Inc.			U.S. EPA ID Number NJD054126164																															
7. Transporter 2 Company Name			U.S. EPA ID Number																															
8. Designated Facility Name and Site Address Stablex Canada, Inc. 760 Industrial Blvd. Blainville, QC J7C 3V4			U.S. EPA ID Number																															
Facility's Phone: (450)430-9230			NYD980756415																															
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.																												
			No.	Type																														
	X	1. UN1935, RQ, Waste Cyanide Solution, N.O.S. (cyanide, copper) 6.1, PG II	14	TP	3,575	G																												
	X	2. UN1588, RQ, Waste Cyanides, Inorganic, Solid, N.O.S. (cyanide, sodium) 6.1, PG II		CF		P																												
13. Waste Codes <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:10%;">D003</td> <td style="width:10%;">P029</td> <td style="width:10%;"></td> <td style="width:10%;"></td> <td style="width:10%;"></td> <td style="width:10%;"></td> <td style="width:10%;"></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table>							D003	P029																										
D003	P029																																	
14. Special Handling Instructions and Additional Information 1. WS#1500272 APP#Stablex Code:012833 ERG#157 2. WS#1500272 APP#Stablex Code:012832 ERG#157																																		
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.																																		
Generator's/Offor's Printed/Typed Name Badger Disposal Ron Mitchell/General Manager			Signature <i>Ron Mitchell</i>		Month Day Year 10 23 09																													
INT'L	16. International Shipments <input type="checkbox"/> Import to U.S. <input checked="" type="checkbox"/> Export from U.S. Port of entry/exit: POET HURON																																	
	Transporter signature (for exports only): <i>Thomas Wilson</i> Date leaving U.S.: 10-25-09																																	
TRANSPORTER	17. Transporter Acknowledgment of Receipt of Materials																																	
	Transporter 1 Printed/Typed Name Thomas Wilson			Signature <i>Thomas Wilson</i>		Month Day Year 10 23 09																												
SIGNATED FACILITY	Transporter 2 Printed/Typed Name			Signature		Month Day Year																												
	18. Discrepancy																																	
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection																																	
	Manifest Reference Number:																																	
18b. Alternate Facility (or Generator)			U.S. EPA ID Number																															
Facility's Phone:																																		
18c. Signature of Alternate Facility (or Generator)					Month Day Year																													
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)																																		
1.		2.		3.		4.																												
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a																																		
Printed/Typed Name			Signature		Month Day Year																													

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number WID988580056	2. Page 1 of 1	3. Emergency Response Phone (414) 236-1080	4. Manifest Tracking Number 001067996 GBF	
5. Generator's Name and Mailing Address Badger Disposal of Wi., Inc. 5611 West Hemlock Street Milwaukee, WI 53223			Generator's Site Address (if different than mailing address)			
6. Transporter 1 Company Name Freehold Cartage, Inc.			U.S. EPA ID Number NJD054126164			
7. Transporter 2 Company Name			U.S. EPA ID Number			
8. Designated Facility Name and Site Address Stablex Canada, Inc. 760 Industrial Blvd. Blainville, QC J7C 3V4			U.S. EPA ID Number NYD980756415			
Facility's Phone: (450) 430-9230						
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.
			No.	Type		
	X	1. UN1935, RQ, Waste Cyanide Solution, N.O.S. (cyanide, sodium) 6.1, PG II	1	TP	275	G
	X	2. UN1935, RQ, Waste Cyanide Solutions, N.O.S. (cyanide, sodium) 6.1, PG II	6	DF	330	G
	X	3. UN1935, RQ, Waste Cyanide Solutions, N.O.S. (cyanide, sodium) 6.1, PG II	1	DM	55	G
X	4. UN3289, RQ, Waste Toxic Liquids, Corrosive, Inorganic, N.O.S. (cyanide, sodium) 6.1(8), PG II	3	DF	165	G	
13. Waste Codes						
D003 P098						
D003 P098						
D003 D006D007						
D008						
F009 D008D002						
D011						
14. Special Handling Instructions and Additional Information						
1. WS#1500272 Stablex Code:012833 ERG#157						
2. WS#1500272 Stablex Code:012833 ERG#157						
3. WS#1500272 Stablex Code:012833 ERG#157						
4. WS#1500272 Stablex Code: 012833 ERG#154						
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.						
Generator's/Officer's Printed/Typed Name Badger Disposal Signature <i>Ron Mitchell</i> Month 11 Day 13 Year 09						
16. International Shipments <input type="checkbox"/> Import to U.S. <input checked="" type="checkbox"/> Export from U.S. Port of entry/exit: Port Huron MI Date leaving U.S.: 03 NOV 2009						
17. Transporter Acknowledgment of Receipt of Materials						
Transporter 1 Printed/Typed Name <i>Reger Wadul</i> Signature <i>Reger Wadul</i> Month 11 Day 03 Year 09						
Transporter 2 Printed/Typed Name _____ Signature _____ Month _____ Day _____ Year _____						
TRANSPORTER	18. Discrepancy					
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection					
	Manifest Reference Number: _____					
DESIGNATED FACILITY	18b. Alternate Facility (or Generator) U.S. EPA ID Number					
	Facility's Phone: _____					
	18c. Signature of Alternate Facility (or Generator) Month _____ Day _____ Year _____					
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)						
1. _____ 2. _____ 3. _____ 4. _____						
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a						
Printed/Typed Name _____ Signature _____ Month _____ Day _____ Year _____						

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number WID988580056	2. Page 1 of 1	3. Emergency Response Phone (414)236-1080	4. Manifest Tracking Number 001068010 GBF	
5. Generator's Name and Mailing Address Badger Disposal of WI., Inc. 5611 West Hemlock Street Milwaukee, WI 53223				Generator's Site Address (if different than mailing address)		
6. Transporter 1 Company Name Freehold Cartage, Inc.				U.S. EPA ID Number NJD054126164		
7. Transporter 2 Company Name				U.S. EPA ID Number		
8. Designated Facility Name and Site Address Stablex Canada, Inc. 760 Industrial Blvd. Blainville, QC J7C 3V4				U.S. EPA ID Number NYD980756415		
Facility's Phone: (450)430-9230						
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
		No.	Type			
X	1. UN3093, RQ, Waste Corrosive Liquid, Oxidizing, N.O.S. (sodium nitrate, sodium hydroxide) 8(5.21), PG II	2	DM	110	G	D001D002
X	2. UN1479, Waste Oxidizing Solid, N.O.S. (sodium dichromate, lead nitrate) 5.1, PG II	1	DF	55	G	D001D007 D011 D006D008 D005
X	3. UN3098, Waste Oxidizing Liquid, Corrosive, N.O.S. (silver nitrate, hydrogen peroxide) 5.1(8), PG II	1	DF	55	G	D001D002 D011
	4.					
14. Special Handling Instructions and Additional Information 1. WS#307-150 Stablex Code:013189 ERG#140 2. LP#00139198 Stablex Code:013198 ERG#140 3. LP#00125468 Stablex Code:013198 ERG#140						
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.						
Generator's/Offeror's Printed/Typed Name Badger Disposal Ron Mitchell/General manager				Signature <i>Ron Mitchell</i>		Month Day Year 11 3 09
16. International Shipments <input type="checkbox"/> Import to U.S. <input checked="" type="checkbox"/> Export from U.S. Port of entry/exit: Port of Huron MI Transporter signature (for exports only): <i>Roger Wadell</i> Date leaving U.S.: 3 Nov 2009						
17. Transporter Acknowledgment of Receipt of Materials						
Transporter 1 Printed/Typed Name Roger Wadell				Signature <i>Roger Wadell</i>		Month Day Year 11 03 09
Transporter 2 Printed/Typed Name				Signature		Month Day Year
18. Discrepancy						
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection						
Manifest Reference Number:						
18b. Alternate Facility (or Generator) U.S. EPA ID Number						
Facility's Phone:						
18c. Signature of Alternate Facility (or Generator) Month Day Year						
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)						
1.		2.		3.		4.
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a						
Printed/Typed Name				Signature		Month Day Year

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number WID988580056	2. Page 1 of 1	3. Emergency Response Phone (414) 236-1080	4. Manifest Tracking Number 001068011 GBF		
5. Generator's Name and Mailing Address Badger Disposal of WI., Inc. 5611 West Hemlock Street Milwaukee, WI, 53223					Generator's Site Address (if different than mailing address)		
6. Transporter 1 Company Name Freehold Cartage, Inc.					U.S. EPA ID Number NJD054126164		
7. Transporter 2 Company Name					U.S. EPA ID Number		
8. Designated Facility Name and Site Address Stablex Canada, Inc. 760 Industrial Blvd. Blainville, QC J7C 3V4					U.S. EPA ID Number NYD980756415		
Facility's Phone: (450) 430-9230							

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
		No.	Type					
X	1. UN3077, RQ, Waste Environmentally Hazardous Substances, Solid, N.O.S. (cyanide, sodium) 9, PG III	10	DM	550	G	D003	F007	F008
X	2. UN3082, Waste Environmentally Hazardous Substances, Liquid, N.O.S. (sodium sulfide) 9, PG III	1	DF	55	G	D003		
X	3. UN1479, Waste Oxidizer Solid, N.O.S. (barium Nitrate, calcium hypochlorite) 5.1, PG II	3	DM	120	G	D001	D005	
X	4. UN1479, Waste Oxidizer Solid, N.O.S. (calcium hypochlorite, chromium) 5.1, PG II	4	DF	120	G	D001	D007	

14. Special Handling Instructions and Additional Information
 1. WS#1500180 Stablex Code: 012887 ERG#171
 2. WS#1500180 Stablex Code: 012886 ERG#171
 3. WS#307-150 Stablex Code: 013189 ERG#140 2x55, 1x10 gal
 4. WS#307-150 Stablex Code: 013189 ERG#140 4x30

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
 I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Officer's Printed/Typed Name **Badger Disposal** Signature *Ron Mitchell* Month **11** Day **3** Year **09**
Ron Mitchell/General manager

16. International Shipments ☐ Import to U.S. ☒ Export from U.S. Port of entry/exit: **Port Huron MI**
 Transporter signature (for exports only): *Roger Washu* Date leaving U.S.: **3 NOV 2009**

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name <i>Roger Washu</i>	Signature <i>Roger Washu</i>	Month 11 Day 03 Year 09
Transporter 2 Printed/Typed Name	Signature	Month Day Year

18. Discrepancy

18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

18b. Alternate Facility (or Generator) U.S. EPA ID Number

Facility's Phone:

18c. Signature of Alternate Facility (or Generator) Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1.	2.	3.	4.
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20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name Signature Month Day Year

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number WID988580056	2. Page 1 of 1	3. Emergency Response Phone (414)236-1080	4. Manifest Tracking Number 001068012 GBF			
5. Generator's Name and Mailing Address Badger Disposal of WI., Inc. 5611 West Hemlock Street Milwaukee, WI 53223					Generator's Site Address (if different than mailing address)			
6. Transporter 1 Company Name Freehold Cartage, Inc.					U.S. EPA ID Number NJD054126164			
7. Transporter 2 Company Name					U.S. EPA ID Number			
8. Designated Facility Name and Site Address Stablex Canada, Inc. 760 Industrial Blvd. Blainville, QC J7C 3V4					U.S. EPA ID Number NYD980756415			
Facility's Phone: (450)430-9230								
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes	
			No.	Type				
	X	1. UN1588, RQ, Waste Cyanides, Inorganic, Solid, N.O.S. (cyanide filters) 6.1, PG II	3	CF	1164	P	D003 F007D007 D008 D002	
	X	2. UN1588, RQ, Waste Cyanides, Inorganic, Solid, N.O.S. (cyanide, sodium) 6.1, PG II	1	DF	55	G	D003 F007D007 D008	
	X	3. UN1588, RQ, Waste Cyanides, Inorganic, Solid, N.O.S. (cyanide, sodium) 6.1, PG II	2	DM	110	G	D003	
X	4. UN3288, RQ, Waste Toxic Solid, Inorganic, N.O.S. (potassium cyanide, sodium cyanide) 6.1, PG II	3	DM	165	G	D003 D006D007 F006 D011		
14. Special Handling Instructions and Additional Information 1. WS#1500272 Stablex Code:012832 ERG#157 2. WS#1500272 Stablex Code:012832 ERG#157 3. WS#1500272 Stablex Code:012832 ERG#157 4. WS#1500272 Stablex Code:012832 ERG#151								
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.								
Generator's/Offor's Printed/Typed Name Badger Disposal Ron Mitchell/General manager					Signature <i>Ron Mitchell</i>		Month Day Year 11/13/09	
INTL	16. International Shipments <input type="checkbox"/> Import to U.S. <input checked="" type="checkbox"/> Export from U.S. Port of entry/exit: Port Huron MI Transporter signature (for exports only): <i>Roger Wadell</i> Date leaving U.S.: 03 Nov 2009							
	17. Transporter Acknowledgment of Receipt of Materials							
TRANSPORTER	Transporter 1 Printed/Typed Name <i>Roger Wadell</i>					Signature <i>Roger Wadell</i>		Month Day Year 11/13/09
	Transporter 2 Printed/Typed Name					Signature		Month Day Year
DESIGNATED FACILITY	18. Discrepancy							
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection							
	Manifest Reference Number:							
	18b. Alternate Facility (or Generator) U.S. EPA ID Number							
Facility's Phone:								
18c. Signature of Alternate Facility (or Generator)							Month Day Year	
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)								
1.		2.		3.		4.		
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a								
Printed/Typed Name					Signature		Month Day Year	

Form for Bringing RCRA Files
to the Region 5 RCRA Records Center

Your name & phone: Jennifer Dodds 6-1484 Today's Date: 12-1-16

Site Name: Badger Disposal of WI, Inc.

Site EPA ID Number: WID 988 580 056

Type(s) of documents:

<input type="checkbox"/> RCRA CA RFA	<input type="checkbox"/> RCRA enforcement
<input type="checkbox"/> RCRA CA RFI	<input checked="" type="checkbox"/> RCRA permit
<input type="checkbox"/> RCRA CA CMS	<input type="checkbox"/> TSCA spill cleanup
<input type="checkbox"/> RCRA CA CMI	<input type="checkbox"/> Other (describe): _____

Quantity of documents: # of boxes: _____ # of folders: 1

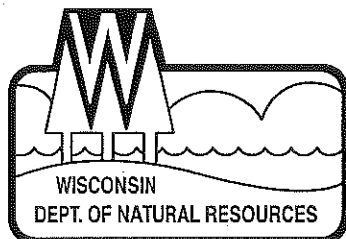
Is any information sensitive or FOIA-exempt? Yes _____ No X

If yes, why?

- ☐ RCRA Confidential Business Information (FOIA exemption 4)
- ☐ EPA Attorney-client privilege or attorney work-product records (exempt 5)
- ☐ EPA "deliberative process" records, e.g., investigative memos, opinions, recommendations, analysis, and conclusions that are pre-decisional (FOIA exempt 5)
- ☐ Contains personal privacy info (e.g. SSN, home address, medical info) (ex 6)
- ☐ EPA internal deliberations for an on-going legal action (exempt 7A)
- ☐ Could identify a confidential EPA source (FOIA exemption 7D)
- ☐ Would reveal EPA law enforcement techniques or procedures (exempt 7E)

VERY IMPORTANT- PLEASE SEGREGATE ANY SENSITIVE/EXEMPT
INFORMATION AND IDENTIFY IT AS SUCH.

Can documents go straight to the Federal Record Center (archives)? Yes X No _____
(Docs can be recalled in 48-72 hours)



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Jim Doyle, Governor
Scott Hassett, Secretary
Gloria L. McCutcheon, Regional Director

Southeast Region Headquarters
2300 N. Dr. Martin Luther King, Jr. Drive
PO Box 12436
Milwaukee, Wisconsin 53212-0436
Telephone 414-263-8500
FAX 414-263-8606
TTY 414-263-8713

January 7, 2004

In Response Refer To: FID#241384000
HW/LIC

Henry Krier, President
Badger Disposal of WI, Inc.
5611 West Hemlock Street
Milwaukee, WI 53223

RE: Final Determination to Approve a Class 2 Plan Modification Request
Badger Disposal of WI Inc., 5611 West Hemlock Street, Milwaukee, WI
EPA ID# WID 988580056,

Dear Mr. Krier:

The Wisconsin Department of Natural Resources (WDNR) has completed its review of your class 2 modification request of June 24, 2003, regarding storage of hazardous waste containers two high. This plan modification does not increase the container storage capacity at Badger. A preliminary determination was issued on November 21, 2003. This letter is a final determination to approve the plan modification request.

WDNR viewed this request to be a class 2 modification as defined in s. NR 680.07(2), Wis. Adm. Code. In accordance with the procedures detailed in s. NR 680.07(6), Wis. Adm. Code, WDNR reviewed the plan modification request for completeness and technical adequacy and determined that it contained the minimum information required pursuant to the aforementioned requirements and is, therefore, complete and technically adequate. WDNR has authority to issue license and plan modifications under s. 289.30(6), Wis. Stats., and s. NR 680.07(2), Wis. Adm. Code.

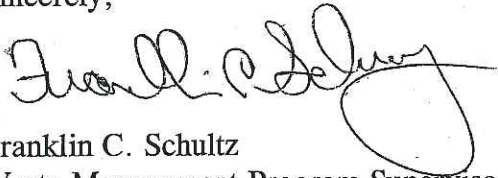
Badger submitted the \$1,200.00 required plan review fee for a class 2 modification on June 24, 2003.

In order for the public to have a chance to comment on this proposal and request a public information hearing pursuant to s. NR 680.05(7), Wis. Adm. Code, a public notice of WDNR's preliminary determination of the class 2 modification was published in the Milwaukee Journal Sentinel and Wisconsin State Journal newspapers on November 21, 2003. A radio announcement was broadcast on the same day during morning and evening drive time on radio station WFMR out of Milwaukee. No comments were received during the 45-day public comment period, which ended on January 5, 2004. No additional conditions have been added to the attached determination.

The final determination must be kept with the feasibility report and plan of operation determinations, the operating license, and all plan modifications for the licensed facility.

Please contact Patrick Brady at (414) 263-8594 if you have any questions on this final plan modification determination.

Sincerely,



Franklin C. Schultz
Waste Management Program Supervisor
Southeast Region

- c. SER Casefile (S. Miller, P. Brady)
Bureau - WA/3 (D. Kollasch)
Denise Reape - U.S. EPA - Region 5, DM-7J



Badger Class 2 Modification Determination - 01/07/04

gallon containers, or 16 1-gallon containers. For containers of sizes other than those listed here, Badger shall limit storage in a 4 55-gallon container area, to within the range of the above explicit container limits. Also, when storing containers of various sizes in a 4 55-gallon container area, Badger shall limit container storage in the 4 55-gallon container area by taking into consideration the above explicit limits for container size with respect to the area. (This is a revised version of Condition #79 from the April 19, 1996, FPOR determination.)

8. Badger shall maintain the lines on the floor of the container storage area to clearly show the container layout pattern shown on the plan sheet named *Facility Drum Storage Layout*, labeled *Sheet 1 of 1*, and dated May 5, 2003.
9. Badger shall revise all applicable sections of the feasibility and plan of operation report to reflect daily operations as altered by this approval and submit revised copies to the WDNR in accordance with s. NR 680.05(c), Wis. Adm. Code, within 60 days of this approval.

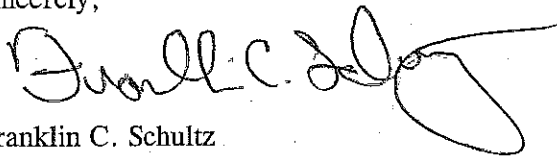
NOTICE OF APPEAL RIGHTS

If you believe you have the right to challenge this decision, you should know that Wisconsin statutes and administrative rules establish time periods within which requests to review department decisions must be filed. For judicial review of a decision pursuant to ss. 227.52 and 227.53, Wisconsin Statutes, you have 30 days after the decision is mailed, or otherwise served by the department, to file your decision with the appropriate circuit court and serve the petition to the department. Such a petition for judicial review shall name the Department of Natural Resources as the respondent. This notice is provided pursuant to s. 227.48(2), Wisconsin Statutes.

Please contact Patrick Brady at (414) 263-8594 if you have any questions.

WISCONSIN DEPARTMENT OF NATURAL RESOURCES
FOR THE SECRETARY

Sincerely,



Franklin C. Schultz
Waste Management Team Supervisor
Southeast Region



Patrick Brady
Waste Management Engineer
Southeast Region

Badger Class 2 Modification Determination - 01/07/04

WDNR has the right to modify this determination and to require additional information at any time. Nothing in this conditional approval shall relieve the owner or operator of the legal obligation to comply with applicable federal, state and local requirements. Except as may be expressly provided below, no other terms or conditions of the feasibility and plan of operation approval or license, or any subsequent modifications thereto, are affected by this determination.

1. The licensee shall comply with all conditions of the license, the provisions of chs. 289 and 291, Wis. Stats., all applicable requirements of chs. 680 through 685, Wis. Adm. Code, the plan of operation approval, and all modifications thereof, and any special order and modifications thereto issued by WDNR, except as otherwise authorized by the WDNR under ss. NR 600.09 or 680.50, Wis. Adm. Code.

2. Badger shall store containers within the pattern laid out on the plan sheet named *Facility Drum Storage Layout*, labeled *Sheet 1 of 1*, and dated May 5, 2003.

3. Badger is limited to storing 720 55-gallon hazardous waste containers in the licensed hazardous waste container storage area in the Container Storage Building. Badger also has a limit of 1,500 55-gallon drums of solid non-hazardous waste in the Container Storage Building. The container storage areas in this building overlap in a defined area (Sheet 1 of 1, dated May 5, 2003) where a maximum of 872 55-gallon drums can be stored on one level and 1,744 55-gallon drums can be stored, when drums are stored two high. For hazardous waste storage, Badger will store only hazardous waste solids and lab packs two high. The total of 720 55-gallon containers of hazardous waste and 1,500 55-gallons of solid waste (2,220 55-gallons) is greater than the allotted space for the area (1,744 55-gallon drums). Badger shall use the following formula to ensure that limits on waste storage are met.

1,744 55-gallon drums = [X (the total number of liquid hazardous waste (non-solid hazardous waste and non-labpack hazardous waste) 55-gallon drums) x 2] + Y (the total number of hazardous waste solids and lab pack 55-gallon drums) + Z (the total number of solid waste 55-gallon drums). Where X + Y can not exceed 720 55-gallon drums, and Z can not exceed 1,500 55-gallon drums. The formula is for 55-gallon drums and their equivalents as shown in condition #7.

4. Badger shall not store hazardous waste liquids two high.
5. When storing containers two high that are greater than 20 gallons in size, Badger shall use pallets to separate the first level from the second level.
6. When storing containers two high, Badger shall only store containers of equal or larger size and equal or larger quantity on the bottom level.
7. Badger shall store and repack containers in a safe manner, whether of 5, 10, 20, 30, or 55-gallon capacity, cubic yard boxes or cubic yard super sacks. In any area, which is designed for storing 4 55-gallon containers, Badger shall not store more than 1 cubic yard box, 1 cubic yard super sack, 5 30-gallon containers, 6 20-gallon containers, 9 10-gallon containers, 12 5-

Badger Class 2 Modification Determination - 01/07/04

on their modification request. On August 27, 2003, Badger submitted to WDNR a response to the incompleteness letter.

6. WDNR issued a preliminary determination on the class 2 modification request on November 18, 2003. A public notice of WDNR's preliminary determination of the class 2 modification was published in the Milwaukee Journal Sentinel and Wisconsin State Journal newspapers on November 21, 2003. A radio announcement was broadcast on November 21, 2003, during morning and evening drive time on radio station WFMR out of Milwaukee. WDNR did not receive any comments during the 45-day public comment period, which ended on January 5, 2004.
7. Pursuant to s. NR 680.07(2), Wis. Adm. Code, WDNR finds this request to be a class 2 plan modification.
8. The requirements of ch. NR 103, Wis. Adm. Code, have been satisfied.

CONCLUSIONS OF LAW

1. WDNR has promulgated chs. NR 600 to 685, Wis. Adm. Code, establishing minimum requirements for hazardous waste management under the authority of ch. 291, Wis. Stats.
2. WDNR has authority pursuant to s. 289.30(6), Wis. Stats., and s. NR 680.07(2), Wis. Adm. Code, to approve a class 2 modification to a license or plan of operation.
3. Any person who owns or operates a hazardous waste facility and proposes to modify that facility's plan approval or license is required to submit a plan modification pursuant to s. NR 680.07, Wis. Adm. Code.
4. Based on the foregoing findings, WDNR has the authority, pursuant to s. 289.30(6), Wis. Stats., and s. NR 680.07(2), Wis. Adm. Code, to issue the following license and plan modification.
5. In accordance with s. NR 680.07, Wis. Adm. Code, WDNR concludes that the revision described in Findings of Fact no. 4. requires a class 2 license and plan modification.

DETERMINATION AND CONDITIONS

Based on the foregoing Findings of Fact and Conclusions of Law, WDNR hereby approves the June 24, 2003, class 2 modification request under s. NR 680.07, Wis. Adm. Code, and s. 289.30(6), Wis. Stats., and in accordance with the license and the most recent plan of operation approval and the conditions set forth as follows:

**BEFORE THE STATE OF WISCONSIN
DEPARTMENT OF NATURAL RESOURCES
A DETERMINATION TO CONDITIONALLY APPROVE
A CLASS 2 MODIFICATION REQUEST TO A
FEASIBILITY AND PLAN OF OPERATION REPORT**

**Badger Disposal of WI, Inc.
Milwaukee, Wisconsin
FID 241384000
WID 988580056**

GENERAL FACILITY INFORMATION

Name of Facility and Location:

Badger Disposal of WI, Inc. (Badger)
5611 W. Hemlock St.
Milwaukee, WI 53223
(414) 760-9175
SW 1/4 of Section 14, Township 8 North, Range 21 East
Milwaukee County

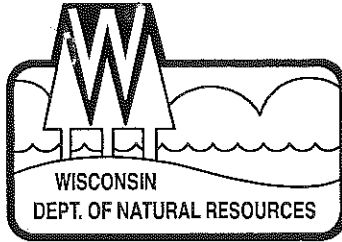
Facility Contact:

Henry Krier, President

FINDINGS OF FACT

The Wisconsin Department of Natural Resources (WDNR) finds that:

1. On April 19, 1996, WDNR issued a feasibility and plan of operation report determination to EOG Disposal, Inc. (now Badger) for a hazardous waste container storage facility at 5611 W. Hemlock St., Milwaukee. On December 16, 1996, WDNR issued to EOG Disposal, Inc. (now Badger) an operating license for hazardous waste container storage at 5611 W. Hemlock St., Milwaukee.
2. On May 14, 1997, WDNR issued to EOG Disposal, Inc. (now Badger) a plan modification determination for the second phase of construction of the hazardous waste management facility.
3. On May 6, 2003, WDNR issued to Badger a plan modification for name and ownership change and the addition of hazardous waste codes.
4. On July 17, 2003, WDNR issued a plan modification determination to Badger for clarification of the hazardous waste container storage capacity at the facility.
5. On June 24, 2003, Badger submitted a class 2 plan modification for storing hazardous waste containers, two high. The modification request does not call for an increase the container storage capacity at Badger. On July 28, 2003, WDNR sent an incompleteness letter to Badger



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Jim Doyle, Governor
Scott Hassett, Secretary
Gloria L. McCutcheon, Regional Director

Southeast Region Headquarters
2300 N. Dr. Martin Luther King, Jr. Drive
PO Box 12436
Milwaukee, Wisconsin 53212-0436
Telephone 414-263-8500
FAX 414-263-8606
TTY 414-263-8713

November 18, 2003

In Response Refer To: FID#241384000
HW/LIC

Henry Krier, President
Badger Disposal of WI, Inc.
5611 West Hemlock Street
Milwaukee, WI 53223

RE: Preliminary Determination to Approve a Class 2 Plan Modification Request
Badger Disposal of WI Inc., 5611 West Hemlock Street, Milwaukee, WI
EPA ID# WID 988580056,

Dear Mr. Krier:

The Wisconsin Department of Natural Resources (WDNR) has completed its review of your class 2 modification request of June 24, 2003, regarding storage of hazardous waste containers two high. This letter is not an approval of the plan modification request but does confirm that the minimum information required by s. NR 680.07, Wis. Adm. Code, has been received. Additional information may be required by WDNR as necessary. Conditions may be added by WDNR during the preliminary determination period.

Badger submitted additional information on August 27, 2003, in response to a July 28, 2003, incompleteness letter from WDNR. This plan modification does not increase the container storage capacity at Badger.

In accordance with the procedures detailed in s. NR 680.07(6), Wis. Adm. Code, WDNR has reviewed the plan modification request for completeness and technical adequacy and has determined that it contains the minimum information required pursuant to the aforementioned requirements and is, therefore, complete and technically adequate. WDNR has authority to issue license and plan modifications under s. 289.30(6), Wis. Stats., and s. NR 680.07(2), Wis. Adm. Code.

Badger submitted the \$1,200.00 required plan review fee for a class 2 modification on June 24, 2003.


WDNR viewed this request to be a class 2 modification as defined in s. NR 680.07(2), Wis. Adm. Code. WDNR is issuing a preliminary determination to approve a class 2 plan modification request. The attached preliminary determination includes conditions. Please review the preliminary determination carefully and submit your comments to Patrick Brady within the 45-day public comment period, which ends on January 5, 2003.

In order that the public has a chance to comment on this proposal and request a public information hearing pursuant to s. NR 680.05(7), Wis. Adm. Code, a public notice of the WDNR's preliminary determination of the class 2 modification will be published in the Wisconsin State Journal and the Milwaukee Journal Sentinel newspapers on November 21, 2003. A radio announcement will be broadcast on the same day during morning and evening drive time on radio station WFMR in Milwaukee.

After WDNR has responded to comments in accordance with s. NR 680.07(6), Wis. Adm. Code, a final determination to approve or disapprove the plan modification request will be issued. The final determination must be kept with the feasibility report and plan of operation determinations, the operating license, and all plan modifications for the licensed facility.

Please contact Patrick Brady at (414) 263-8594 if you have any questions on this preliminary determination.

Sincerely,

For 
Franklin C. Schultz
Waste Management Program Supervisor
Southeast Region

- c. SER Casefile (S. Miller, P. Brady)
Bureau WA/3 - (D. Kollash)
U.S. EPA Region 5 - (Denise Reape, DE-9J)

**BEFORE THE STATE OF WISCONSIN
DEPARTMENT OF NATURAL RESOURCES
PRELIMINARY DETERMINATION TO CONDITIONALLY APPROVE
A CLASS 2 MODIFICATION REQUEST TO A
FEASIBILITY AND PLAN OF OPERATION REPORT**

**Badger Disposal of WI, Inc.
Milwaukee, Wisconsin
FID 241384000
WID 988580056**

GENERAL FACILITY INFORMATION

Name of Facility and Location:

Badger Disposal of WI, Inc. (Badger)
5611 W. Hemlock St.
Milwaukee, WI 53223
(414) 760-9175
SW 1/4 of Section 14, Township 8 North, Range 21 East
Milwaukee County

Facility Contact:

Henry Krier, President

FINDINGS OF FACT

The Wisconsin Department of Natural Resources (WDNR) finds that:

1. On April 19, 1996, WDNR issued a feasibility and plan of operation report determination to EOG Disposal, Inc. (now Badger) for a hazardous waste container storage facility at 5611 W. Hemlock St., Milwaukee. On December 16, 1996, WDNR issued to EOG Disposal, Inc. (now Badger) an operating license for hazardous waste container storage at 5611 W. Hemlock St., Milwaukee.
2. On May 14, 1997, WDNR issued to EOG Disposal, Inc. (now Badger) a plan modification determination for the second phase of construction of the hazardous waste management facility.
3. On May 6, 2003, WDNR issued to Badger a plan modification for name and ownership change and the addition of hazardous waste codes.
4. On July 17, 2003, WDNR issued a plan modification determination to Badger for clarification of the hazardous waste container storage capacity at the facility.
5. On June 24, 2003, Badger submitted a class 2 plan modification for storing hazardous waste containers, two high. The modification request does not call for an increase the container storage capacity at Badger. On July 28, 2003, WDNR sent an incompleteness letter to Badger

Badger Class 2 Modification Preliminary Determination - 11/18/03

on their modification request. On August 27, 2003, Badger submitted to WDNR a response to the incompleteness letter.

4. Pursuant to s. NR 680.07(2), Wis. Adm. Code, WDNR finds this request to be a class 2 plan modification.
6. The requirements of ch. NR 103, Wis. Adm. Code, have been satisfied.

CONCLUSIONS OF LAW

1. WDNR has promulgated chs. NR 600 to 685, Wis. Adm. Code, establishing minimum requirements for hazardous waste management under the authority of ch. 291, Wis. Stats.
2. WDNR has authority pursuant to s. 289.30(6), Wis. Stats., and s. NR 680.07(2), Wis. Adm. Code, to approve a class 2 modification to a license or plan of operation.
3. Any person who owns or operates a hazardous waste facility and proposes to modify that facility's plan approval or license is required to submit a plan modification pursuant to s. NR 680.07, Wis. Adm. Code.
4. Based on the foregoing findings, WDNR has the authority, pursuant to s. 289.30(6), Wis. Stats., and s. NR 680.07(2), Wis. Adm. Code, to issue the following license and plan modification.
5. In accordance with s. NR 680.07, Wis. Adm. Code, WDNR concludes that the revision described in Findings of Fact no. 4. requires a class 2 license and plan modification.

DETERMINATION AND CONDITIONS

Based on the foregoing Findings of Fact and Conclusions of Law, WDNR hereby approves the June 24, 2003, class 2 modification request under s. NR 680.07, Wis. Adm. Code, and s. 289.30(6), Wis. Stats., and in accordance with the license and the most recent plan of operation approval and the conditions set forth as follows:

WDNR has the right to modify this determination and to require additional information at any time. Nothing in this conditional approval shall relieve the owner or operator of the legal obligation to comply with applicable federal, state and local requirements. Except as may be expressly provided below, no other terms or conditions of the feasibility and plan of operation approval or license, or any subsequent modifications thereto, are affected by this determination.

1. The licensee shall comply with all conditions of the license, the provisions of chs. 289 and 291, Wis. Stats., all applicable requirements of chs. 680 through 685, Wis. Adm. Code, the plan of operation approval, and all modifications thereof, and any special order and modifications

Badger Class 2 Modification Preliminary Determination - 11/18/03

thereto issued by WDNR, except as otherwise authorized by the WDNR under ss. NR 600.09 or 680.50, Wis. Adm. Code.

2. Badger shall store containers within the pattern laid out on the plan sheet named *Facility Drum Storage Layout*, labeled *Sheet 1 of 1*, and dated May 5, 2003.
3. Badger is limited to storing 720 55-gallon hazardous waste containers in the licensed hazardous waste container storage area in the Container Storage Building. Badger also has a limit of 1,500 55-gallon drums of solid non-hazardous waste in the Container Storage Building. The container storage areas in this building overlap in a defined area (Sheet 1 of 1, dated May 5, 2003) where a maximum of 872 55-gallon drums can be stored on one level and 1,744 55-gallon drums can be stored, when drums are stored two high. For hazardous waste storage, Badger will store only hazardous waste solids and lab packs two high. The total of 720 55-gallon containers of hazardous waste and 1,500 55-gallons of solid waste (2,220 55-gallons) is greater than the allotted space for the area (1,744 55-gallon drums). Badger shall use the following formula to ensure that limits on waste storage are met.

$$1,744 \text{ 55-gallon drums} = [X (\text{the total number of liquid hazardous waste (non-solid hazardous waste and non-labpack hazardous waste) 55-gallon drums}) \times 2] + Y (\text{the total number of hazardous waste solids and lab pack 55-gallon drums}) + Z (\text{the total number of solid waste 55-gallon drums}).$$
Where $X + Y$ can not exceed 720 55-gallon drums, and Z can not exceed 1,500 55-gallon drums. The formula is for 55-gallon drums and their equivalents as shown in condition #7.
4. Badger shall not store hazardous waste liquids two high.
5. When storing containers two high that are greater than 20 gallons in size, Badger shall use pallets to separate the first level from the second level.
6. When storing containers two high, Badger shall only store containers of equal or larger size and equal or larger quantity on the bottom level.
7. Badger shall store and repack containers in a safe manner, whether of 5, 10, 20, 30, or 55-gallon capacity, cubic yard boxes or cubic yard super sacks. In any area, which is designed for storing 4 55-gallon containers, Badger shall not store more than 1 cubic yard box, 1 cubic yard super sack, 5 30-gallon containers, 6 20-gallon containers, 9 10-gallon containers, 12 5-gallon containers, or 16 1-gallon containers. For containers of sizes other than those listed here, Badger shall limit storage in a 4 55-gallon container area, to within the range of the above explicit container limits. Also, when storing containers of various sizes in a 4 55-gallon container area, Badger shall limit container storage in the 4 55-gallon container area by taking into consideration the above explicit limits for container size with respect to the area. (This is a revised version of Condition #79 from the April 19, 1996, FPOR determination.)
8. Badger shall maintain the lines on the floor of the container storage area to clearly show the container layout pattern shown on the plan sheet named *Facility Drum Storage Layout*, labeled

Badger Class 2 Modification Preliminary Determination - 11/18/03

Sheet 1 of 1, and dated May 5, 2003.

9. Badger shall revise all applicable sections of the feasibility and plan of operation report to reflect daily operations as altered by this approval and submit revised copies to the WDNR in accordance with s. NR 680.05(c), Wis. Adm. Code, within 60 days of this approval.


NOTICE OF APPEAL RIGHTS

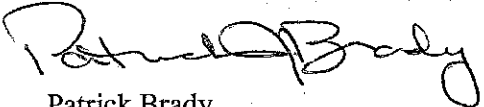
If you believe you have the right to challenge this decision, you should know that Wisconsin statutes and administrative rules establish time periods within which requests to review department decisions must be filed. For judicial review of a decision pursuant to ss. 227.52 and 227.53, Wisconsin Statutes, you have 30 days after the decision is mailed, or otherwise served by the department, to file your decision with the appropriate circuit court and serve the petition to the department. Such a petition for judicial review shall name the Department of Natural Resources as the respondent. This notice is provided pursuant to s. 227.48(2), Wisconsin Statutes.

Please contact Patrick Brady at (414) 263-8594 if you have any questions.

WISCONSIN DEPARTMENT OF NATURAL RESOURCES
FOR THE SECRETARY

Sincerely,

For 
Franklin C. Schultz
Waste Management Team Supervisor
Southeast Region


Patrick Brady
Waste Management Engineer
Southeast Region

**PUBLIC NOTICE
BEFORE THE STATE OF WISCONSIN
NOTICE OF FILING A PRELIMINARY DETERMINATION
TO APPROVE A PLAN MODIFICATION REQUEST FOR
BADGER DISPOSAL OF WI, INC.
MILWAUKEE, WISCONSIN**

NOTICE IS HEREBY GIVEN, that the Department of Natural Resources (WDNR) has determined that the plan modification request submitted by Badger Disposal of WI, Inc. (Badger) on June 24, 2003, is complete and technically adequate. The facility is located at 5611 W. Hemlock St., Milwaukee, Wisconsin.

Badger has a hazardous waste container storage license. The purpose of this plan modification request is to allow Badger to store containers two high in their licensed hazardous waste container storage area. This plan modification does not increase the container storage capacity at Badger.

The public is invited to submit written comments on the Badger plan modification within 45 days from the date of publication of this notice, November 21, 2003. The public comment period ends on January 5, 2004. Comments shall be addressed to Patrick Brady, WDNR, P.O. Box 12436, Milwaukee, Wisconsin 53212.

A written request for a public informational hearing may be filed with the Secretary of the Department by any county, city, village, town, or any person affected by the proposed facility within 45 days after publication of this notice. All hearing requests should be filed either by delivery to the Office of the Secretary of the WDNR at 101 South Webster Street, Madison, Wisconsin 53707, or by certified mail addressed to the Secretary, WDNR, P.O. Box 7921, Madison, Wisconsin 53707.

Interested individuals may submit written comments and/or requests to the WDNR to hold a public informational hearing on this proposed modification. Written comments and/or requests should include:

1. A statement of the person's interest or concern in the license application.
2. A statement of the action the person wishes the WDNR to take, including specific references to sections of the approval that the person believes should be changed, and/or the issues the person would like the WDNR to address at the hearing.
3. The statement of the reason supporting the person's position, stated with sufficient specificity so as to allow the WDNR to investigate the merits of the person's position, including reasons for requesting a public informational hearing.

If a public hearing is requested and scheduled, the hearing shall be conducted as an informational hearing utilizing the procedures in s. 277.18, Wisconsin Statutes. A notice of the hearing will be made in local newspapers and over a local radio station.

After the close of the public comment period and before issuing the plan modification, the WDNR will evaluate all comments received. Each person who submitted written comments or requested notice of a decision will receive notice of the final decisions of WDNR. At the same

time, the WDNR will also respond to all significant comments, specify if there are any changes and indicate whether additional comments or new materials have been included in the administrative record.

Copies of the administrative record including the plan modification request and the draft plan modification determination are available for public review at the following location:


WDNR, Southeast Region Headquarters, 2300 N. Dr. Martin Luther King Jr. Drive,
Milwaukee, WI 53212.

At the Southeast Region Headquarters, appointments for reviewing the administrative record can be made by calling (414) 263-8500.

Dated at Milwaukee, Wisconsin, November 18, 2003.

STATE OF WISCONSIN DEPARTMENT OF NATURAL RESOURCES

For the Secretary

A handwritten signature in dark ink, appearing to read "Franklin C. Schultz".

For
Franklin C. Schultz
Waste Management Team Supervisor
Southeast Region

Brady, Pat J

From: Brady, Pat J
Sent: Thursday, November 13, 2003 3:47 PM
To: 'mschuster@mkeradiogrp.com'
Subject: Radio Announcement

Mike Schuster
WFMR
414/978-9000

Hello,

The following radio announcement is to be broadcast on the station, WFMR, during morning and evening drive time on Friday, November 21, 2003. The areas in black in the radio announcement can be deleted if their is not enough space. Please contact me if you have any questions.

Thanks for your efforts,



Patrick Brady

Waste Management Engineer
Southeast Region - Milwaukee Service Center
Wisconsin Department of Natural Resources
(t) phone: (414) 263-8594
(t) fax: (414) 263-8716
(+) e-mail: pat.brady@dnr.state.wi.us

RADIO ANNOUNCEMENT

Badger Disposal of WI, Inc. is seeking from the Wisconsin Department of Natural Resources a plan modification to their hazardous waste management container storage operating license for their facility at 5611 West Hemlock Street, Milwaukee. The modification will allow Badger to store containers two high in their licensed container storage area. This plan modification does not increase the container storage capacity at Badger.


WDNR believes this modification of the Badger license will meet state environmental requirements and intends to approve the modification.

Before taking these actions, you can review files, provide written comments, and request a public hearing.

Files can be reviewed at WDNR offices at 2300 North Dr. Martin Luther King Jr. Drive, Milwaukee.

Comments or requests for a hearing, can be filed with Patrick Brady, DNR, PO Box 12436, Milwaukee, 53212, within the 45-day public comment period starting on November 21, 2003, and ending on January 5, 2004.

For more information contact Patrick Brady at 414/263-8594.



CONVERSATION RECORD		TIME 0900 hrs	DATE Oct 23, 2003
TYPE <input type="checkbox"/> VISIT <input type="checkbox"/> CONFERENCE <input checked="" type="checkbox"/> TELEPHONE <input type="checkbox"/> INCOMING <input checked="" type="checkbox"/> OUTGOING			
LOCATION OF VISIT/CONFERENCE: Room 815 - Jennifer Dodds and Todd Ramaly present			
NAME OF PERSON(S) CONTACTED OR IN CONTACT WITH YOU Kandylee Schmidt (C.O.) Henry Krier (President)		ORGANIZATION (OFFICE, DEPT., BUREAU, ETC.) Badger Disposal of Wisconsin Inc. (formerly EOG Disposal, Inc.)	PHONE NO. (414) 760-9175 ext.221
SUBJECT Badger's Federal Permit Status			
SUMMARY Todd Ramaly and myself spoke with H. Krier and K. Schmidt about the current physical status of their facility as well as any future plans they have for new development that would be included in their federal permit . At present they are a transfer and storage facility that does not do any type of treatment or stabilization of wastes. They transfer and store wastes from and into 55 gallon drums, Super Sacks, Totes, Lab Packs, and Cubic Boxes. They are proposing to handle all of the wastes as CC materials, unless they can be proven to be exempt. Krier and Schmidt were asked to review the CFR 264.1080 - 264.1091 Subpart CC Air Emission Standards further. They are also to evaluate whether to apply for a federal permit prior to their WDNR license renewal, or to consolidate the two processes. They were reminded that they are not to handle the wastes which Wisconsin is not authorized for until they do receive their federal permit.			
ACTION REQUIRED Krier and Schmidt are to review the CFR Subpart CC regulations as well as their two options for applying for their RCRA federal permit. They are to contact Dodds with their decision by phone. They are aware that in the interim they are not to be accepting any wastes which Wisconsin is not authorized. These wastes were summarized in a previous conversation record dated July 14, 2003.			
PERSON DOCUMENTING CONVERSATION Jennifer Dodds		SIGNATURE 	DATE Oct 23, 2003
ACTION TAKEN			
SIGNATURE		TITLE Environmental Scientist	DATE
J.Stubenrauch, 2/24/2000, F:\USER\SHARE\STUBENFORMS\PHONECONVERSATION.PC			

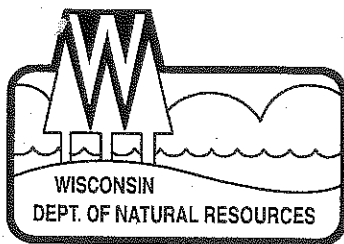
CONVERSATION RECORD		TIME 0915 hrs	DATE July 14, 2003
TYPE <input type="checkbox"/> VISIT <input type="checkbox"/> CONFERENCE <input checked="" type="checkbox"/> TELEPHONE <input type="checkbox"/> INCOMING <input checked="" type="checkbox"/> OUTGOING			
LOCATION OF VISIT/CONFERENCE: 08075			
NAME OF PERSON(S) CONTACTED OR IN CONTACT WITH YOU Kandylee Schmidt		ORGANIZATION (OFFICE, DEPT., BUREAU, ETC.) Badger Disposal of Wisconsin Inc. (formerly EOG Disposal, Inc.)	PHONE NO. (414) 760-9175 ext.221
SUBJECT Badger's Federal Permit Status			
SUMMARY <p>I briefed Schmidt about the problems EPA has with Badger's most recent modification to their WDNR license. First, Wisconsin hasn't been authorized for several of the waste codes mentioned in the modification. I told her that, typically, U.S. EPA would approve those waste codes in a federal permit. However, we don't seem to have a record of a federal permit at Badger.</p> <p>Schmidt agreed that there wasn't a federal permit. She also confirmed that they do store off-site wastes for longer than 10-days so they would not be considered a transfer facility. I asked her about applying for a federal permit and she said there have been no major changes to the facility since the original application (actually a Feasibility and Plan of Operations Report - the Wisconsin version of a Part B application) was sent to EPA in 1994. She said Badger would not want to rewrite the application until they needed to reapply for their license from WDNR, in about 18 months.</p>			
ACTION REQUIRED <p>Check with H. Croke to see what option recommended by management: 1) ask for a new permit application and proceed to review and potentially issue permit; 2) use the old application and process a new permit; or 3) wait until they reapply for their WDNR license.</p>			
PERSON DOCUMENTING CONVERSATION Todd D. Ramaly		SIGNATURE	DATE July 14, 2003
ACTION TAKEN <p>After discussing the issue with H. Croke, we agreed that we should attempt to use the existing application to process a new federal permit so that the waste codes could be added along with subpart CC controls.</p> <p>At 1030hrs, I called Ms. Schmidt to relay this information. I also stated that she shouldn't handle the wastes which Wisconsin is not authorized for until she gets the federal permit. According to our authorization section, Wisconsin is not authorized to recognize K-listed wastes numbered 156 or higher, P-listed wastes numbered 127 or higher, and U-listed wastes numbered 248 or higher.</p>			
SIGNATURE		TITLE Environmental Scientist	DATE July 14, 2003
J.Stubenrauch, 2/24/2000, F:\USER\SHARE\STUBENFORMS\PHONECONVERSATION.PC			

WID 988 580 056

EOG DISPOSAL

BADGER DISPOSAL

CONVERSATION RECORD		TIME 0915 hrs	DATE July 14, 2003
TYPE <input type="checkbox"/> VISIT <input type="checkbox"/> CONFERENCE <input checked="" type="checkbox"/> TELEPHONE <input type="checkbox"/> INCOMING <input checked="" type="checkbox"/> OUTGOING			
LOCATION OF VISIT/CONFERENCE: 08075			
NAME OF PERSON(S) CONTACTED OR IN CONTACT WITH YOU Kandylee Schmidt		ORGANIZATION (OFFICE, DEPT., BUREAU, ETC.) Badger Disposal of Wisconsin Inc. (formerly EOG Disposal, Inc.)	PHONE NO. (414) 760-9175 ext.221
SUBJECT Badger's Federal Permit Status			
SUMMARY <p>I briefed Schmidt about the problems EPA has with Badger's most recent modification to their WDNR license. First, Wisconsin hasn't been authorized for several of the waste codes mentioned in the modification. I told her that, typically, U.S. EPA would approve those waste codes in a federal permit. However, we don't seem to have a record of a federal permit at Badger.</p> <p>Schmidt agreed that there wasn't a federal permit. She also confirmed that they do store off-site wastes for longer than 10-days so they would not be considered a transfer facility. I asked her about applying for a federal permit and she said there have been no major changes to the facility since the original application (actually a Feasibility and Plan of Operations Report - the Wisconsin version of a Part B application) was sent to EPA in 1994. She said Badger would not want to rewrite the application until they needed to reapply for their license from WDNR, in about 18 months.</p>			
ACTION REQUIRED <p>Check with H. Croke to see what option recommended by management: 1) ask for a new permit application and proceed to review and potentially issue permit; 2) use the old application and process a new permit; or 3) wait until they reapply for their WDNR license.</p>			
PERSON DOCUMENTING CONVERSATION Todd D. Ramaly		SIGNATURE 	DATE July 14, 2003
ACTION TAKEN <p>After discussing the issue with H. Croke, we agreed that we should attempt to use the existing application to process a new federal permit so that the waste codes could be added along with subpart CC controls.</p> <p>At 1030hrs, I called Ms. Schmidt to relay this information. I also stated that she shouldn't handle the wastes which Wisconsin is not authorized for until she gets the federal permit. According to our authorization section, Wisconsin is not authorized to recognize K-listed wastes numbered 156 or higher, P-listed wastes numbered 127 or higher, and U-listed wastes numbered 248 or higher.</p>			
SIGNATURE 		TITLE Environmental Scientist	DATE July 14, 2003
J.Stubenrauch, 2/24/2000, F:\USER\SHARE\STUBENFORMS\PHONECONVERSATION.PC			



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Jim Doyle, Governor
Scott Hassett, Secretary
Gloria L. McCutcheon, Regional Director

Southeast Region Headquarters
2300 N. Dr. Martin Luther King, Jr. Drive
PO Box 12436
Milwaukee, Wisconsin 53212-0436
Telephone 414-263-8500
FAX 414-263-8606
TTY 414-263-8713

July 17, 2003

In Response Refer To: FID#241384000
HW/LIC

Henry Krier, President
Badger Disposal of WI, Inc.
5611 West Hemlock Street
Milwaukee, WI 53223

RE: Badger Disposal of WI Inc., 5611 West Hemlock Street, Milwaukee, WI
EPA ID# WID 988580056, Conditional Class 1 Plan Modification Preliminary
Determination/Clarification of Hazardous Waste Container Storage Capacity

Dear Mr. Krier:

The Wisconsin Department of Natural Resources (WDNR) acknowledges receipt of the May 7, 2003, letter from Badger Disposal of WI, Inc. (Badger) regarding hazardous waste container storage capacity and the attached *Facility Drum Storage Layout*, Sheet 1 of 1. WDNR concurs with Badger's assessment of 720 55-gallon containers of hazardous waste as the capacity of the container storage area. WDNR is clarifying the container hazardous waste storage capacity of 720 55-gallon containers through a class 1 plan modification conditional determination. This letter serves notice that WDNR has completed its review and is issuing a preliminary determination at this time to Badger to clarify the hazardous waste storage capacity.

Based on WDNR's recent inspections of the facility and a review of the file, WDNR felt that a clarification was needed on Badger's container storage capacity. WDNR realizes that there is some confusion as to the licensed container storage capacity of the facility based on the April 19, 1996, Feasibility and Plan of Operation Report (FPOR) Determination and the associated layouts in the FPOR. The April 19, 1996, FPOR Determination explains that after Phase 2 construction is approved, Badger will be licensed to store 720 55-gallon containers but refers to the layout shown on Figure 1 in Attachment 18 of the FPOR, which only allows for 468 containers. In order to resolve this confusion, WDNR requested Badger to submit a revised container storage layout in an April 21, 2003, letter. Badger responded in the May 7, 2003, letter.

WDNR has two items in the May 7, 2003, letter that we can not concur with at this time. In the 5th paragraph of the letter, Badger states that, *"Total storage capacity combining 1,500 - 55 gallon drums of solid waste and 720 - 55 gallon drums of hazardous waste is 2,200 gallons."* Badger uses the same storage area for both solid and hazardous waste. If a container space is used for solid waste, that space cannot be used for hazardous waste storage. As a condition in this determination, WDNR is requiring that in addition to the maximum capacities listed above (720 - 55 gallon containers for hazardous waste and 1500 - 55 gallon containers for solid waste), Badger must apply the following formula to determine the interconnected capacities of solid and hazardous waste. The formula is $[(X \text{ solid waste containers})/2] + Y \text{ hazardous waste containers} = (\text{or less than}) 750$, where X is the number of solid waste containers, Y is the number of hazardous waste containers, and 750 is the number of available spaces on one level.

If Badger is interested in storing hazardous waste containers at 2 high or increasing the hazardous waste storage capacity, WDNR will not be able to make a determination on this request without going through a class 2 modification. If Badger would like to further pursue this option, Badger should submit a plan modification request. WDNR has received badger's June 24, 2003 class 2 modification request and we are currently in the process of reviewing the request.

You may submit written comments to WDNR regarding this preliminary determination within 15 days of the date of this letter. A final determination may be issued thereafter based on comments we receive. Because this is a class 1 modification, if no written comments are received by WDNR by the end of the 15-day comment period, then the preliminary determination will become a final determination. This plan modification must be kept with FPOR determination, the operating license, and all plan modifications for the licensed facility.

PRELIMINARY AND FINAL DETERMINATION

FINDINGS OF FACT

The Department finds that:

1. On April 19, 1996, WDNR issued a favorable FPOR determination for hazardous waste container storage to EOG Disposal Inc. for the facility at 5611 West Hemlock Street, Milwaukee. On December 16, 1996, WDNR issued the initial operating license for hazardous waste container storage to EOG Disposal Inc.
2. On May 14, 1997, WDNR issued a modification determination for the second phase of construction at EOG Disposal Inc.
3. On June 17, 2003, WDNR issued a class 1 modification determination regarding a change in ownership, a name change from EOG Disposal, Inc. to Badger Disposal of WI, Inc., and the addition of some K, P and U wastes codes.
4. On April 21, 2003, WDNR sent a letter to Badger, requesting Badger to submit a revised container storage layout. On May 7, 2003, Badger submitted a response.
5. WDNR inspected the facility on December 13, 2002. On January 8, 2003, WDNR sent a notice of non-compliance to the facility regarding container storage management at the facility. Follow-up inspections were conducted on March 27, 2003, and April 9, 2003. Badger is working to address container storage management at the facility.

CONCLUSIONS OF LAW

1. WDNR has promulgated chs. NR 600 to 685, Wis. Adm. Code, establishing minimum requirements for hazardous waste management under the authority of ch. 291, Wis. Stats.
2. WDNR has authority pursuant to s. 289.30(6), Wis. Stats, and s. NR 680.07(1), Wis. Adm. Code, to approve a class 1 modification to a license or plan of operation.
3. In accordance with s. NR 680.07, Wis. Adm. Code, WDNR concludes that the clarification described in Findings of Fact #3 require a class 1 license and plan modification.

DETERMINATION AND CONDITIONS

Based on the foregoing Findings of Fact and Conclusions of Law, WDNR hereby approves the this class 1 modification request regarding container storage capacity under s. NR 680.07, Wis. Adm. Code, and s. 289.30(6), Wis. Stats., and in accordance with the license and the most recent plan of operation approval and the conditions set forth as follows:

WDNR has the right to modify this determination and to require additional information at any time. Nothing in this conditional approval shall relieve the owner or operator of the legal obligation to comply with applicable federal, state and local requirements. Except as may be expressly provided below, no other terms or conditions of the FPOR approval or license, or any subsequent modifications thereto, are affected by this determination.

1. The licensee shall comply with all conditions of the license, the applicable provisions of chs. 280, 281, 283, 285, 287, 289, 291, 292, 293, and 299, Wis. Stats., all applicable requirements of chs. NR 680 through 685, Wis. Adm. Code, the plan of operation approval, and all modifications thereof, and any special order and modifications thereto issued by WDNR, except as otherwise authorized by WDNR under ss. NR 600.09 or 680.50, Wis. Adm. Code.
2. The maximum amount of hazardous waste containers that can be stored at Badger is 720 55-gallon containers, or an equivalent based on the size of the containers as explained in condition #79 of the April 19, 1996, FPOR determination. Since solid waste containers are stored in the same area that is used to store hazardous waste containers, the hazardous waste container storage capacity is also limited and determined by the number of solid waste containers stored. Badger must also use the following formula to determine the hazardous waste storage capacity, $[(X \text{ solid waste containers})/2] + Y \text{ hazardous waste containers} = (\text{or less than}) 750$. Where X is the number of solid waste containers, Y is the number of hazardous waste containers, and 750 is the number of available spaces on one level.
3. Badger shall store containers within the pattern shown in the *Facility Drum Storage Layout*, Sheet 1 of 1, of the May 7, 2003, submittal from Badger.
4. Badger shall maintain an adequate 3-foot aisle space between rows of containers
5. Within 60 days of the date of this determination, Badger shall mark lines on the floor of the container storage area to clearly show the container layout pattern shown in the *Facility Drum Storage Layout*, Sheet 1 of 1, of the May 7, 2003, submittal.
6. Badger shall not store hazardous waste containers and solid waste containers within the same 4 55-gallon container unit.
7. If Badger wants to expand the hazardous waste storage capacity or store hazardous waste containers 2 high, Badger must submit a class 2 modification request.
8. If no written comments are received by WDNR within the 15-day comment period, this preliminary determination shall become WDNR's final determination. If comments are received, a final determination will be issued after WDNR evaluates the comments.

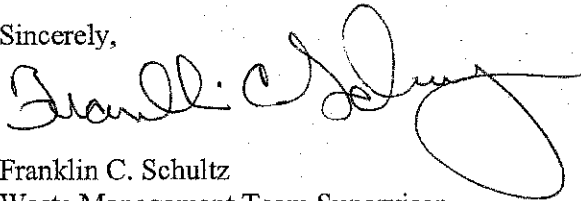
NOTICE OF APPEAL RIGHTS

If you believe you have the right to challenge this decision, you should know that Wisconsin statutes and administrative rules establish time periods within which requests to review WDNR decisions must be filed. For judicial review of a decision pursuant to ss. 227.52 and 227.53, Wis. Stats., you have 30 days after the decision is mailed, or otherwise served by WDNR, to file your decision with the appropriate circuit court and serve the petition to the WDNR. Such a petition for judicial review shall name the Department of Natural Resources as the respondent. This notice is provided pursuant to s. 227.48(2), Wis. Stat.

Please contact Patrick Brady at (414) 263-8594 if you have any questions.

WISCONSIN DEPARTMENT OF NATURAL RESOURCES
FOR THE SECRETARY

Sincerely,

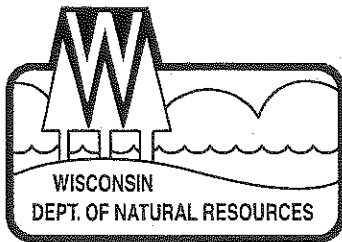


Franklin C. Schultz
Waste Management Team Supervisor
Southeast Region



Patrick Brady
Waste Management Engineer

- c. SER Casefile (S. Miller, P. Brady)
Bureau - WA/3 (Dave Kollash)
Denise Reape - U.S. EPA - Region 5, DE-9J



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Jim Doyle, Governor
Scott Hassett, Secretary
Gloria L. McCutcheon, Regional Director

Southeast Region Headquarters
2300 N. Dr. Martin Luther King, Jr. Drive
PO Box 12436
Milwaukee, Wisconsin 53212-0436
Telephone 414-263-8500
FAX 414-263-8606
TTY 414-263-8713

RECEIVED

JUN 26 2003

June 17, 2003

Technical Support and Permits Section In Response Refer To: FID#241384000
Waste Management Branch
Waste, Pesticides and Toxics Division
U.S. EPA - Region 5
HW/APPR

Kandylee Schmidt, Compliance Officer
Badger Disposal of WI, Inc. (EOG Disposal Inc.)
5611 West Hemlock Street
Milwaukee, WI 53223

RE: EOG Disposal Inc. (Badger Disposal of WI, Inc.), 5611 West Hemlock Street, Milwaukee, WI
EPA ID# - WID 988580056, Conditional Class 1 Plan Modification Final Determination
Name and Ownership Change

Dear Ms. Schmidt:

On May 6, 2003, the Wisconsin Department of Natural Resources (WDNR) sent out a preliminary class 1 plan modification determination to Badger Disposal of WI Inc. (Badger) for a change in name and owner and addition of waste codes. On May 7, 2003, Badger submitted a license application to show the change of property ownership to Badger Investment Realty, LLC. No other comments were received on the May 6, 2003, preliminary determination. With the incorporation of the above change, the determination is now issued as final.

On April 9, 2003, EOG Disposal Inc. (EOG) requested a class 1 plan modification request regarding the transfer of ownership and a change of name of the EOG licensed hazardous waste storage facility. On March 7, 2003, EOG also submitted a modification request, which included the addition of K, P and U waste codes for EOG. In order to incorporate the transfer of ownership, the requested name change from EOG Disposal Inc. to Badger Disposal of WI, Inc., and the addition of the waste codes, WDNR is issuing a class 1 plan modification final determination.

This plan modification must be kept with the feasibility and plan of operation report (FPOR) determination, the operating license, and all plan modifications for the licensed facility.

FINAL DETERMINATION

FINDINGS OF FACT

The Department finds that:

1. On April 19, 1996, WDNR issued a favorable feasibility and plan of operation report determination for hazardous waste container storage to EOG for the facility at 5611 West Hemlock Street, Milwaukee. On December 16, 1996, WDNR issued the initial operating license for hazardous waste container storage.
2. On March 7, 2003, EOG submitted a class 1 modification request regarding a change in ownership, a name change from EOG Disposal, Inc. to Badger Disposal of WI, Inc., and the

addition of some K, P and U wastes codes. The March 7, 2003, submittal included a check for \$300.00 to cover the review fee for a class 1 modification for a hazardous waste container storage facility.

3. On April 9, 2003, EOG submitted a revised class 1 modification request regarding a change in ownership and a name change from EOG Disposal, Inc. to Badger Disposal of WI, Inc. The submittal included a filled out hazardous waste facility license application, 2 copies of revised Part A notification forms, and a copy of the transfer of ownership.
4. The transfer of ownership from Vil-Kri Investments, LLC, (the owner of the EOG licensed hazardous waste storage facility) was completed effective January 31, 2003. The new owner of the Badger property is Badger Investment Realty, LLC.
5. On April 24, 2003, EOG faxed me a copy of correspondence with their attorney and the State of Wisconsin Department of Financial Institutions regarding the name change.
6. On May 6, 2003, WDNR issued a preliminary determination. On May 7, 2003, Badger submitted a revised license application to reflect a change in the owner of the property.
7. WDNR inspected the facility on December 13, 2002. On January 8, 2003, WDNR sent a notice of non-compliance to the facility regarding container storage management at the facility. Follow-up inspections were conducted on March 27, 2003, and April 9, 2003. EOG is working to address container storage management at the facility. In an April 21, 2003, letter, WDNR requested a clarification from EOG on the capacity and configuration of container storage area.

CONCLUSIONS OF LAW

1. WDNR has promulgated chs. NR 600 to 685, Wis. Adm. Code, establishing minimum requirements for hazardous waste management under the authority of ch. 291, Wis. Stats.
2. WDNR has authority pursuant to s. 289.30(6), Wis. Stats, and s. NR 680.07(1), Wis. Adm. Code, to approve a class 1 modification to a license or plan of operation.
3. In accordance with s. NR 680.07, Wis. Adm. Code, WDNR concludes that the revisions described in Findings of Fact #2. And #3 require a class 1 license and plan modification.

DETERMINATION AND CONDITIONS

Based on the foregoing Findings of Fact and Conclusions of Law, WDNR hereby approves the April 9, 2003, and March 7, 2003, class 1 modification requests under s. NR 680.07, Wis. Adm. Code, and s. 289.30(6), Wis. Stats., and in accordance with the license and the most recent plan of operation approval and the conditions set forth as follows:

WDNR has the right to modify this determination and to require additional information at any time. Nothing in this conditional approval shall relieve the owner or operator of the legal obligation to comply with applicable federal, state and local requirements. Except as may be expressly provided below, no other terms or conditions of the feasibility and plan of operation approval or license, or any subsequent modifications thereto, are affected by this determination.

1. The licensee shall comply with all conditions of the license, the applicable provisions of chs. 280, 281, 283, 285, 287, 289, 291, 292, 293, and 299, Wis. Stats., all applicable requirements of chs. NR 680 through 685, Wis. Adm. Code, the plan of operation approval, and all modifications thereof, and any special order and modifications thereto issued by WDNR, except as otherwise authorized by WDNR under ss. NR 600.09 or 680.50, Wis. Adm. Code.
2. In accordance with s. NR 680.44, Wis. Adm. Code, EOG (Badger Disposal of WI., Inc.) shall within 6 months of the transfer of responsibility (January 31, 2003 plus 6 months would be July 31, 2003) shall demonstrate compliance to WDNR with the closure, long-term care, financial responsibility and liability requirements in s. NR 600.05, and chs. NR 630 to 685, including ss. NR 685.05, 685.06, 685.07 and 685.08, Wis. Adm. Code. ?
3. With this modification, EOG (Badger Disposal of WI., Inc.) is now able to accept the following waste codes: K156, K157, K158, K159, K161, K174, K175, K169, K170, K171, K172, P127, P128, P185, P188, P189, P190, P191, P192, P194, P196, P197, P198, P199, P201, P202, P203, P204, P205, U271, U278, U279, U280, U364, U367, U372, U373, U387, U389, U394, U395, U404, U409, and U411. K 151 ?

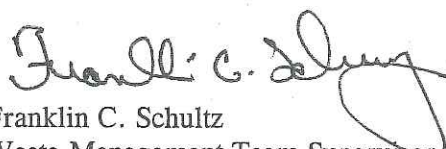
NOTICE OF APPEAL RIGHTS

If you believe you have the right to challenge this decision, you should know that Wisconsin statutes and administrative rules establish time periods within which requests to review WDNR decisions must be filed. For judicial review of a decision pursuant to ss. 227.52 and 227.53, Wis. Stats., you have 30 days after the decision is mailed, or otherwise served by WDNR, to file your decision with the appropriate circuit court and serve the petition to the WDNR. Such a petition for judicial review shall name the Department of Natural Resources as the respondent. This notice is provided pursuant to s. 227.48(2), Wis. Stat.

Please contact Patrick Brady at (414) 263-8594 if you have any questions.

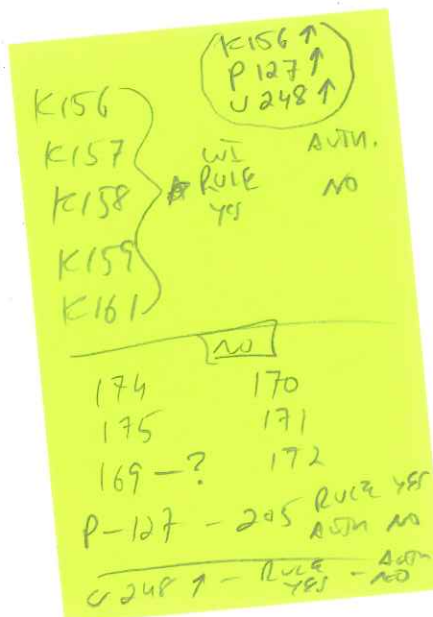
WISCONSIN DEPARTMENT OF NATURAL RESOURCES
FOR THE SECRETARY

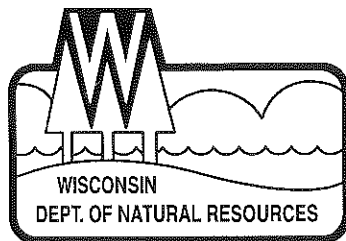
Sincerely,


Franklin C. Schultz
Waste Management Team Supervisor
Southeast Region


Patrick Brady
Waste Management Engineer

- c. SER Casefile (S. Miller, P. Brady)
Bureau - WA/3 (Dave Kollash)
Denise Reape - U.S. EPA - Region 5, DE-9J


K156 ↑
P127 ↑
U248 ↑
K156 } WI Rule YES
K157 } AUTM. NO
K158 }
K159 }
K161 }
174 170
175 171
169 - ? 172
P-127 - 205 Rule YES
AUTM NO
U248 ↑ - Rule YES - AUTM NO



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Jim Doyle, Governor
Scott Hassett, Secretary
Gloria L. McCutcheon, Regional Director

Southeast Region Headquarters
2300 N. Dr. Martin Luther King, Jr. Drive
PO Box 12436
Milwaukee, Wisconsin 53212-0436
Telephone 414-263-8500
FAX 414-263-8606
TTY 414-263-8713

May 6, 2003

In Response Refer To: FID#241384000
HW/APPR

Kandylee Schmidt, Compliance Officer
Badger Disposal of WI, Inc. (EOG Disposal Inc.)
5611 West Hemlock Street
Milwaukee, WI 53223

RE: EOG Disposal Inc. (Badger Disposal of WI, Inc.), 5611 West Hemlock Street, Milwaukee, WI
EPA ID# - WID 988580056, Conditional Class 1 Plan Modification Preliminary Determination

Dear Ms. Schmidt:

This letter acknowledges receipt by the Wisconsin Department of Natural Resources (WDNR) of the April 9, 2003, class 1 plan modification request from EOG Disposal Inc. (EOG) regarding the transfer of ownership and a change of name of the EOG licensed hazardous waste storage facility. On March 7, 2003, EOG also submitted a modification request, which included the addition of K, P and U waste codes for EOG. In order to incorporate the transfer of ownership, the requested name change from EOG Disposal Inc. to Badger Disposal of WI, Inc., and the addition of the waste codes, WDNR is issuing a class 1 plan modification determination. This letter serves notice that WDNR has completed its review of the modification request and is issuing a preliminary determination at this time which will incorporate the requested changes.

You may submit written comments to WDNR regarding this preliminary determination within 30 days of the date of this letter. A final determination may be issued thereafter based on comments we receive. Because this is a class 1 modification, if no written comments are received by WDNR by the end of the 30-day comment period, then the preliminary determination will become a final determination. This plan modification must be kept with the feasibility and plan of operation report (FPOR) determination, the operating license, and all plan modifications for the licensed facility.

PRELIMINARY AND FINAL DETERMINATION

FINDINGS OF FACT

The Department finds that:

1. On April 19, 1996, WDNR issued a favorable feasibility and plan of operation report determination for hazardous waste container storage to EOG for the facility at 5611 West Hemlock Street, Milwaukee. On December 16, 1996, WDNR issued the initial operating license for hazardous waste container storage.
2. On March 7, 2003, EOG submitted a class 1 modification request regarding a change in ownership, a name change from EOG Disposal, Inc. to Badger Disposal of WI, Inc., and the addition of some K, P and U wastes codes. The March 7, 2003, submittal included a check for

\$300.00 to cover the review fee for a class 1 modification for a hazardous waste container storage facility.

3. On April 9, 2003, EOG submitted a revised class 1 modification request regarding a change in ownership and a name change from EOG Disposal, Inc. to Badger Disposal of WI, Inc. The submittal included a filled out hazardous waste facility license application, 2 copies of revised Part A notification forms, and a copy of the transfer of ownership.
4. The transfer of ownership of Vil-Kri Investments, L.L.C., (the owner of the EOG licensed hazardous waste storage facility) was completed effective January 31, 2003.
5. On April 24, 2003, EOG faxed me a copy of correspondence with their attorney and the State of Wisconsin Department of Financial Institutions regarding the name change.
6. WDNR inspected the facility on December 13, 2002. On January 8, 2003, WDNR sent a notice of non-compliance to the facility regarding container storage management at the facility. Follow-up inspections were conducted on March 27, 2003, and April 9, 2003. EOG is working to address container storage management at the facility. In an April 21, 2003, letter, WDNR requested a clarification from EOG on the capacity and configuration of container storage area.

CONCLUSIONS OF LAW

1. WDNR has promulgated chs. NR 600 to 685, Wis. Adm. Code, establishing minimum requirements for hazardous waste management under the authority of ch. 291, Wis. Stats.
2. WDNR has authority pursuant to s. 289.30(6), Wis. Stats, and s. NR 680.07(1), Wis. Adm. Code, to approve a class 1 modification to a license or plan of operation.
3. In accordance with s. NR 680.07, Wis. Adm. Code, WDNR concludes that the revisions described in Findings of Fact #2. And #3 require a class 1 license and plan modification.

DETERMINATION AND CONDITIONS

Based on the foregoing Findings of Fact and Conclusions of Law, WDNR hereby approves the April 9, 2003, and March 7, 2003, class 1 modification requests under s. NR 680.07, Wis. Adm. Code, and s. 289.30(6), Wis. Stats., and in accordance with the license and the most recent plan of operation approval and the conditions set forth as follows:

WDNR has the right to modify this determination and to require additional information at any time. Nothing in this conditional approval shall relieve the owner or operator of the legal obligation to comply with applicable federal, state and local requirements. Except as may be expressly provided below, no other terms or conditions of the feasibility and plan of operation approval or license, or any subsequent modifications thereto, are affected by this determination.

1. The licensee shall comply with all conditions of the license, the applicable provisions of chs. 280, 281, 283, 285, 287, 289, 291, 292, 293, and 299, Wis. Stats., all applicable requirements of chs. NR 680 through 685, Wis. Adm. Code, the plan of operation approval, and all modifications thereof, and any special order and modifications thereto issued by WDNR, except as otherwise authorized by WDNR under ss. NR 600.09 or 680.50, Wis. Adm. Code.

2. In accordance with s. NR 680.44, Wis. Adm. Code, EOG (Badger Disposal of WI., Inc.) shall within 6 months of the transfer of responsibility (January 31, 2003 plus 6 months would be July 31, 2003) shall demonstrate compliance to WDNR with the closure, long-term care, financial responsibility and liability requirements in s. NR 600.05, and chs. NR 630 to 685, including ss. NR 685.05, 685.06, 685.07 and 685.08, Wis. Adm. Code.
3. With this modification, EOG (Badger Disposal of WI., Inc.) is now able to accept the following waste codes: K156, K157, K158, K159, K161, K174, K175, K169, K170, K171, K172, P127, P128, P185, P188, P189, P190, P191, P192, P194, P196, P197, P198, P199, P201, P202, P203, P204, P205, U271, U278, U279, U280, U364, U367, U372, U373, U387, U389, U394, U395, U404, U409, and U411
4. If no written comments are received by WDNR within the 30-day comment period, this preliminary determination shall become WDNR's final determination. If comments are received, a final determination will be issued after WDNR evaluates the comments.


NOTICE OF APPEAL RIGHTS

If you believe you have the right to challenge this decision, you should know that Wisconsin statutes and administrative rules establish time periods within which requests to review WDNR decisions must be filed. For judicial review of a decision pursuant to ss. 227.52 and 227.53, Wis. Stats., you have 30 days after the decision is mailed, or otherwise served by WDNR, to file your decision with the appropriate circuit court and serve the petition to the WDNR. Such a petition for judicial review shall name the Department of Natural Resources as the respondent. This notice is provided pursuant to s. 227.48(2), Wis. Stat.

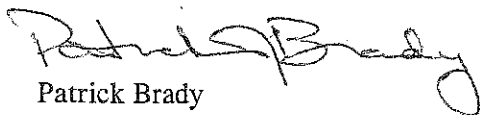
Please contact Patrick Brady at (414) 263-8594 if you have any questions.

WISCONSIN DEPARTMENT OF NATURAL RESOURCES
FOR THE SECRETARY

Sincerely,



For
Franklin C. Schultz
Waste Management Team Supervisor
Southeast Region



Patrick Brady
Waste Management Engineer

- c. SER Casefile (S. Miller, P. Brady)
Bureau - WA/3 (Dave Kollash)
Denise Reape - U.S. EPA - Region 5, DE-9J

ORC ATTORNEY ASSIGNMENT FORM		
CASE/MATTER NAME: Badger Disposal of Wisconsin, Inc.		
PROGRAM ASSIGNEE: Jennifer Dodds, TSP-section, WMB, WPTD		PHONE: 886-1484
FACILITY NAME: Badger Disposal of Wisconsin, Inc. (formerly EOG Disposal, Inc.)		
ADDRESS: 5611 West Hemlock Street	CITY: Milwaukee	COUNTY: Milwaukee
STATE: Wisconsin	ZIP CODE: 53223	USEPA ID# WID 988 580 056
PROPOSED DEFENDANTS/RESPONDENTS/PRPS:		
ADMINISTRATIVE ENFORCEMENT <input type="checkbox"/> JUDICIAL ENFORCEMENT <input type="checkbox"/>		
BID PROTEST <input type="checkbox"/> PROTEST NO.		
GRANT ASSISTANCE DISPUTE <input type="checkbox"/> AGREEMENT NO. AUDIT NO.		
PERMIT <input checked="" type="checkbox"/> DEFENSIVE CASE <input type="checkbox"/> APPEALED TO EAB <input type="checkbox"/> OTHER COUNSEL MATTER <input type="checkbox"/>		
LAW/SECTION (STATUTE and SECTION which authorize action, e.g. CAA/113(d) penalty order, CERCLA/106 AO response action, RCRA/3008(a) complaint and penalty order): RCRA Section 3004 "Standards Applicable to Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities" RCRA Section 3005 "Permits for Treatment, Storage, and Disposal of Hazardous Waste"		
LAW/SECTION (STATUTE and SECTION violated, or that provides requirement to be enforced, e.g., RCRA/3004, CAA/112): RCRA		
POLLUTANTS: Storage of hazardous waste materials including combustible waste, laboratory waste, waste oil, paint waste, solvent waste, and other organic and inorganic materials.		
Is matter in geographic initiative area? Which one?		
Is matter multi-media? No		
COMMENTS: The site is being evaluated for EJ concerns.		
PROGRAM PERSON TO WHOM THIS FORM RETURNED WHEN COMPLETED: Jennifer Dodds		
ORC ATTORNEY ASSIGNMENT (Completed By ORC Section Chiefs)		
DATE RECEIVED: 10/9/03	BRANCH: MMI	SECTION: 1/Fox
ATTORNEY NAME: Robert Guenther	PHONE: 6-0566	DATE ASSIGNED: 10/9/03
ORC MANAGER: PLEASE FORWARD COMPLETED FORM TO CHERYL KLEBENOW, C-29A. (886-6771)		
TO BE COMPLETED BY ORC DOCKET ANALYST		
RMTS MATTER NUMBER: 05-9 - _____.		(March 1996 version)

